EPA Registration File
53883-328
Vol. 2

DATA EXTRACTION REQUEST

Reg # 53883-328 Decision # 492711

Description: Amend

Material Sent:

☑ Electronic Label/Letter Dated 8/28/14
(See PPLS for electronic file)

☐ Stamped Label Dated _____ (See jacket)

☐ Notification Dated _____ (See jacket)

☐ New CSF(s) Dated _____ (See jacket)

☐ Other: _____

File this coversheet and attached materials in the jacket. It must be well organized and clipped together, NOT STAPLED. Then give the jacket with the coversheet and materials to staff in the Information Services Center (ISC) (Room S-4900). If a jacket is full or only available as an image, please file materials in a new jacket and bring it down to the (ISC). For further information please call 703-605-0716.

Reviewer: Jennifer Urbanski

Division: RD

Phone: 347-0156

Date: 9/3/14

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, DC 20460

OFFICE OF CHEMICAL SAFETY
AND POLLUTION PREVENTION

August 28, 2014

Rami Soufi
Control Solutions, Inc.
5903 Genoa Red Bluff Rd.
Pasadena, TX 77507

Subject: Agency-initiated action to add a golf course restriction, delete application to root flare of trees, and add a restriction for 2' by 2' perimeter use
Product Name: CSI Imidacloprid + Fipronil SC
EPA Registration Number: 53883-328
Application Date: August 25, 2014
Decision Number: 492711

Dear Mr. Soufi:

The amended label referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide and Rodenticide Act, as amended, is acceptable.

A stamped copy of your labeling is enclosed for your records. This labeling supersedes all previously accepted labeling. The next label printing of this product must use this labeling unless subsequent changes have been approved. You must submit one copy of the final printed labeling before you release the product for shipment with the new labeling. In accordance with 40 CFR 152.130(c), you may distribute or sell this product under the previously approved labeling for 18 months from the date of this letter. After 18 months, you may only distribute or sell this product if it bears this new revised labeling or subsequently approved labeling. "To distribute or sell" is defined under FIFRA section 2(gg) and its implementing regulation at 40 CFR 152.3.

Your release for shipment of the product constitutes acceptance of these conditions. If these conditions are not complied with, the registration will be subject to cancellation in accordance with FIFRA section 6(e). If you have any questions, you may contact Jennifer Urbanski at 703-347-0156 or via email at urbanski.jennifer@epa.gov.

Sincerely,

Venus Eagle

Venus Eagle, Product Manager 01
Insecticide-Rodenticide Branch
Registration Division
Office of Pesticide Programs

Enclosure

CSI Imidacloprid + Fipronil SC

[Alternate Brand Name: Dominion® Pro Insecticide/Termiticide] [ABN: Dominion® Pro][ABN: Dominion® Pro Termiticide/Insecticide][ABN: DOMINATE™][ABN: Matrix][Generic descriptor: Termiticide/Insecticide] [ABN: Fuse™ Termiticide/Insecticide][ABN: Fuse™]

It is a violation of federal law to use this product in a manner inconsistent with its labeling.

- **DO NOT** use this product for termite or other pest control indoors, except for label-specified applications for termite control and foam applications to wall voids for control of other listed pests.
- **DO NOT** use on animal trophies or animal skins.
- **DO NOT** use on/in commercial beehives.
- **DO NOT** use on golf course turf. May be used for control of termites found on/near structures associated with golf courses, but only as specified on this label.

See inside booklet for additional **Restrictions, First Aid, Precautionary Statements, Directions For Use, Conditions of Sale and Warranty,** and state-specific use sites and/or restrictions.

For sale to, use and storage only by individuals/firms licensed or registered by the state to apply termiticide and/or general pest control products.

ACTIVE INGREDIENTS:	
[1]Imidacloprid	21.4%
[2]Fipronil	6.6%
OTHER INGREDIENTS:	72.0%
Total:	100.0%

[1]Imidacloprid: 1-1(6-Chloro-3-pyridinyl)methyl]-N-nitro-2-imidazolidinimine

[2]Fipronil: (5-amino-1-(2,6-dichloro-4-(trifluoromethyl)phenyl)-4-((1,R,S)-(trifluoromethyl)sulfinyl)-1-H-pyrazole-3-carbonitrile)

Contains 2.0 pounds of imidacloprid per gallon and 0.6 pounds of fipronil per gallon.
Shake well before using.

EPA Reg. No. 53883-328

EPA Est. No. 53883-TX-002
37429-GA-001[BT]
37429-GA-002[BO]

[(See attached label for additional precautionary information and complete Directions for Use).]

Control Solutions, Inc.
5903 Genoa-Red Bluff
Pasadena, TX 77507-1041

Net Contents:

KEEP OUT OF REACH OF CHILDREN

CAUTION/PRECAUCIÓN

PRECAUCIÓN AL USUARIO: Si usted no puede leer o entender inglés, no use este producto hasta que la etiqueta le haya sido explicada ampliamente.
(TO THE USER: If you cannot read or understand English, do not use this product until the label has been fully explained to you.)

FIRST AID	
Have the product container or label with you when calling a poison control center or doctor, or going for treatment.	
If swallowed:	• Call a Poison Control Center or doctor immediately for treatment advice. • Have person sip a glass of water if able to swallow. • Do not induce vomiting unless told to do so by a poison control center or doctor. • Do not give anything by mouth to an unconscious person.
If on skin or clothing:	• Take off contaminated clothing. • Rinse skin immediately with plenty of water for 15-20 minutes. • Call a poison control center or doctor for treatment advice.
If inhaled:	• Move person to fresh air. • If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably by mouth-to-mouth, if possible. • Call a poison control center or doctor for treatment advice.
If in eyes:	• Hold eye open and rinse slowly and gently with water for 15-20 minutes. Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye. • Call a poison control center or doctor for treatment advice.
Note to Physician: There is no specific antidote. All treatment should be based on observed signs and symptoms of distress in the patient. Overexposure to materials other than this product may have occurred. In severe cases of overexposure by oral ingestion, lethargy, muscle tremors, and in extreme cases, possibly convulsions may occur.	
Have the product container or label with you when calling a poison control center or doctor, or going for treatment. You may also contact SafetyCall® (866) 897-8050 for emergency medical treatment information.	

PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS AND DOMESTIC ANIMALS

CAUTION: Harmful if swallowed, absorbed through skin or inhaled. Do not get in eyes, on skin or on clothing. Do not breathe spray mist. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, or using tobacco. Remove and wash contaminated clothing before reuse.

Personal Protective Equipment (PPE):
Applicators and other handlers (mixers and loaders) must wear:

- Long-sleeved shirt and long pants.
- Chemical-resistant gloves made of any waterproof material such as barrier laminate, butyl rubber, nitrile rubber, neoprene rubber, natural rubber, polyvinylchloride (PVC) or viton.
- Shoes plus socks.

In addition: All pesticide handlers must wear a dust/mist filtering respirator (MSHA/NIOSH approval number prefix TC-21C), or a NIOSH approved respirator with any N, R, P or HE filter, when working in a non-ventilated space, including but not limited to crawl-spaces and basements. All pesticide handlers must wear protective eyewear (goggles, a face shield, or safety glasses with front, brow, and temple protection) when working in a non-ventilated space, including but not limited to crawl-spaces and basements or when applying termiticide by rodding or sub-slab injection.

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Venus Eagle

Venus Eagle, Product Manager 01
Insecticide-Rodenticide Branch
Registration Division
Office of Pesticide Programs

Enclosure

ACCEPTED
08/28/2014
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CSI Imidacloprid + Fipronil SC

[Alternate Brand Name: Dominion® Pro Insecticide/Termiticide] [ABN: Dominion® Pro][ABN: Dominion® Pro Termiticide/Insecticide][ABN: DOMINATE™][ABN: Matrix][Generic descriptor: Termiticide/Insecticide] [ABN: Fuse™ Termiticide/Insecticide][ABN: Fuse™]

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Personal Protective Equipment (PPE):
Applicators and other handlers (mixers and loaders) must wear:

- Long-sleeved shirt and long pants.
- Chemical-resistant gloves made of any waterproof material such as barrier laminate, butyl rubber, nitrile rubber, neoprene rubber, natural rubber, polyvinylchloride (PVC) or viton.
- Shoes plus socks.

In addition: All pesticide handlers must wear a dust/mist filtering respirator (MSHA/NIOSH approval number prefix TC-21C), or a NIOSH approved respirator with any N, R, P or HE filter, when working in a non-ventilated space, including but not limited to crawl-spaces and basements. All pesticide handlers must wear protective eyewear (goggles, a face shield, or safety glasses with front, brow, and temple protection) when working in a non-ventilated space, including but not limited to crawl-spaces and basements or when applying termiticide by rodding or sub-slab injection.

Follow manufacturer's instructions for cleaning/maintaining PPE. If no such instructions for washables, use detergent and hot water. Keep and wash PPE separately from other laundry.

USER SAFETY RECOMMENDATIONS

User must:

- Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, using tobacco, or using the toilet.
- Remove and wash contaminated clothing before reuse. Then wash body thoroughly with soap and water and put on clean clothing.
- Remove PPE immediately after handling this product. Wash outside of gloves before removing.

ENVIRONMENTAL HAZARDS

This product is toxic to birds and fish and highly toxic to aquatic invertebrates. Do not apply directly to water, to areas where surface water is present or to intertidal areas below the mean high water mark. Runoff from treated areas may be hazardous to aquatic organisms in neighboring areas. Do not contaminate water when disposing of equipment washwaters.

This product is highly toxic to bees exposed to direct treatment or residues on blooming crops/plants or weeds. Do not apply this product or allow it to drift to blooming crops/plants or weeds if bees are foraging in the treatment area.

This chemical demonstrates the properties and characteristics associated with chemicals detected in groundwater. The use of this chemical in areas where soils are permeable, particularly where the water table is shallow, may result in groundwater contamination.

Apply this product only as specified on this label. Extreme care must be taken to avoid runoff. Apply only to soil or other fill substrate that will accept the solution at the specified rate. Do not treat soil that is water-saturated or frozen or in any conditions where run-off or movement from the treatment area (site) is likely to occur.

DIRECTIONS FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with its labeling.

Read entire label before using this product.

Do not apply this product in a way that will contact workers or other persons, either directly or through drift. Only protected handlers may be in the area during application. For any requirements specific to your State or Tribe, consult the agency responsible for pesticide regulation.

APPLICATION AS A TERMITICIDE

CSI Imidacloprid + Fipronil SC may be used in and along the outside perimeter of structures and building construction to prevent and control termite infestations.

USE INSTRUCTIONS

For subterranean termite control, specific treatment recommendations may differ due to regulations, treatment procedures, soil types, construction practices and other factors. The purpose of chemical soil treatment for termite control is to establish a continuous treated zone (horizontal and/or vertical) between the wood and other cellulose material in the structure and the termite colonies in the soil. Follow all federal, state, and local regulations and treatment standards for protection of a structure from termites. The establishment of an aerial or above ground colony may require additional treatments to control the termites, as well as landscape modifications, and/or structural repairs to deny termites of a moisture source. Use a 0.067% to 0.13% dilution based on current recommendations. For a typical control situation, a 0.067% dilution is used. A 0.13% dilution may be used when a severe or persistent infestation exists.

When treating adjacent to an existing structure, the applicator must check the area to be treated, and immediately adjacent areas of the structure, for visible and accessible cracks and holes to prevent any leaks or significant exposures to persons occupying the structure. People present or residing in the structure during application must be advised to remove their pets and themselves from the structure if they see any signs of leakage. After application, the applicator is required to check for leaks. All leaks resulting in the deposition of termiticide in locations other than those prescribed on this label must be cleaned up prior to leaving the application site. Do not allow people or pets to contact contaminated areas or to reoccupy contaminated areas of the structure until the clean-up is completed.

Structures that contain wells or cisterns within the foundation of the structure can only be treated using the treated backfill method described in the treatment around wells and cisterns section *of* this label. Consult state and local specifications for recommended distances of wells from treated area, or if such regulations do not exist, refer to Federal Housing Administration Specifications (H.U.D.) for guidance.

MIXING: Refer to **MIXING TABLE** for correct amount of CSI IMIDACLOPRID + FIPRONIL SC to be used. Follow this procedure for mixing the termiticide dilution:

1. Fill tank to 1/3 full.
2. If using large sprayer, start pump to begin bypass agitation and place end of treating tool in tank to allow circulation through hose.
3. Add appropriate amount of CSI IMIDACLOPRID + FIPRONIL SC.
4. Add remaining amount of water.
5. Let pump run and allow recirculation through the hose for 2 to 3 minutes or until the product is completely dispersed.

MIXING TABLE FOR CSI IMIDACLOPRID + FIPRONIL SC		
DILUTION CONCENTRATE	**GALLONS WATER**	**AMOUNT OF CSI Imidacloprid + Fipronil SC**
0.067%	100	27.5 fl. oz.
	50	13.8 fl. oz.
	25	6.9 fl. oz.
	1	0.3 fl. oz.
0.13%	100	55 fl. oz.
	50	27.5 fl. oz.
	25	13.8 fl. oz.
	1	0.6 fl. oz.

MIXING TABLE FOR CSI IMIDACLOPRID + FIPRONIL SC		
DILUTION CONCENTRATE	**GALLONS WATER**	**AMOUNT OF CSI Imidacloprid + Fipronil SC**
0.067%	10	2.8 fl. oz.
	5	1.4 fl. oz.
	2	0.6 fl. oz.
	1	0.3 fl. oz.
0.13%	10	5.6 fl. oz.
	5	2.8 fl. oz.
	2	1.2 fl. oz.
	1	0.6 fl. oz.

IN-LINE INJECTION: Use the table below to mix the appropriate amount of CSI IMIDACLOPRID + FIPRONIL SC for the desired injection volume of finished dilution.

MIXING TABLE - INJECTOR	
INJECTOR VOLUME	**CONCENTRATION**
0.3 fl. oz./gal	0.067%
0.6 fl. oz./gal	0.13%

CONVERSION KEY: 128 fl. oz. = 1 gal; 16 fl. oz. = 1 pint; 8 pints = 1 gal; 1 fl. oz. = 29.5 mL

APPLICATION VOLUME

To provide maximum control and protection against termite infestation, apply the specified volume of the finished water solution and active ingredients as set forth in the directions for use section of this label. If soil will not accept the labeled application volume, the volume may be reduced provided there is a corresponding increase in concentration so that the amount of active ingredients applied to the soil remains the same.
Note: Large reductions of application volume reduce the ability to obtain a continuous barrier. Variance is allowed when volume and concentration are consistent with label directed rates and a continuous barrier can still be achieved.

PRE-CONSTRUCTION TREATMENT

Do not apply at a lower dosage and/or concentration than specified on this label for application prior to installation of the finished grade.

Prior to each application, applicators must notify the general contractor, construction superintendent, or similar responsible party, of the intended termiticide application and intended sites of application and instruct the responsible person to notify construction workers and other individuals to leave the area to be treated during application and until the termiticide is absorbed into the soil.

CONCRETE SLAB-ON-GROUND OR BASEMENTS: Apply an overall treatment to the entire surface of soil or other substrate to be covered by the slab including areas to be under carports, porches, basement floor and entrance platforms. Apply at the rate of 1 gallon of solution to accurately and uniformly cover 10 square feet. If fill under slab is gravel or other coarse aggregate, apply at the rate of 1.5 gallons or sufficient volume of solution, to accurately and uniformly cover 10 square feet. In addition, apply 4 gallons of solution (see **APPLICATION VOLUME**) per 10 linear feet to provide a uniform treated zone in soil at critical areas such as along the inside of foundation walls, and around plumbing, bath traps, utility services, and other features that will penetrate the slab. If slab fill cannot be poured the same day as treatment, it is necessary to cover the sub-slab treatment with a waterproof barrier such as polyethylene sheeting.

After completion of grading, make an application by trenching or trenching and rodding around the slab or foundation perimeter. Rodding may be done from the bottom of a shallow trench. When rodding, rod holes must be spaced in a manner that will allow for a continuous treated zone, not to exceed 12 inches, to be deposited along the treated area. Rod holes must not extend below the footing. Apply 4 gallons of solution (see **APPLICATION VOLUME**) per 10 linear feet, per foot of depth to provide a uniform treated zone. When trenching, the trench along the outside foundation must be about 6 inches in width and 6 inches in depth. Use a low pressure spray (not to exceed 25 PSI at the treatment tool when the valve is open) to treat soil which will be placed in the trench after rodding. Mix the spray solution with soil as it is being placed in the trench. When treating voids in hollow masonry units, use 2 gallons of solution per 10 linear feet of wall. Apply solution so it will reach the footing by injecting into the lower areas of the wall, just above the floor or footing.

When treating foundations deeper than 4 feet, apply the termiticide as the backfill is being replaced or if the construction contractor fails to notify the applicator to permit this, treat the foundation to a minimum depth of 4 feet after the backfill has been installed. The applicator must trench and rod into the trench or trench along the foundation walls and around pillars and other foundation elements, at the rate prescribed from grade to a minimum depth of 4 feet. When the top of the footing is exposed, the applicator must treat the soil adjacent to the footing to a depth not to exceed the bottom of the footing. Do not treat structures below the footing.

Rodding in trench followed by flooding of trench and treatment of backfill may provide a better opportunity to achieve a continuous treated zone than using soil rodding alone to establish a vertical treated zone.

CRAWL SPACES: Application must be made by trenching or trenching and rodding downward along the inside and outside of foundation walls, around piers, interior supports in contact with the soil, plumbing, and utility services. Apply 4 gallons of solution (see **APPLICATION VOLUME**) per 10 linear feet, per foot of depth to provide a uniform treated zone. Rodding may be done from the bottom of a shallow trench to top of the footing or a minimum of 4 feet. When rodding, rod holes must be spaced in a manner that will allow for a continuous treated zone, not to exceed 12 inches, to be deposited along the treated area. Rod holes must not extend below the footing. When trenching, the trench must be about 6 inches wide and 6 inches deep. Use a low pressure spray to treat soil which will be placed in the trench, mixing the spray solution with soil as it is being placed in the trench.

HOLLOW BLOCK FOUNDATIONS OR VOIDS: Hollow block foundations or voids in masonry resting on the footing may be treated to provide a continuous treated zone in the voids at the footing. Apply 2 gallons of solution per 10 linear feet to the lower part of the void so that it reaches the top of the footing or soil.

Treatment of voids in block or rubble foundation walls must be closely examined. Applicators must inspect areas of possible runoff as a precaution against application leakage in the treated areas. Some areas may not be treatable or may require mechanical alteration prior to treatment.

All leaks resulting in the deposition of termiticide in locations other than those prescribed on this label must be cleaned up prior to leaving the application site (refer to **PRECAUTIONARY STATEMENTS**). Do not allow people or pets to contact or to reoccupy the contaminated areas of the structure until the clean-up is completed.

POST-CONSTRUCTION TREATMENT

CONCRETE SLAB-ON-GROUND: To apply a treatment under the slab, including attached porches, carports, entrance platforms, garages and similar slab structures, it may be necessary to drill through the slab or exterior foundation. Drill holes must be spaced in a manner that will allow for application of a continuous treated zone. Treat all existing cracks and old construction or expansion joints. Also, treat around bath traps, plumbing and utility services which penetrate the slab. Apply 4 gallons of solution (see **APPLICATION VOLUME**) per 10 linear feet per foot of depth to provide a uniform treated zone. DO NOT MAKE TREATMENT UNTIL LOCATION OF HEAT OR AIR CONDITIONING DUCTS AND VENTS ARE KNOWN AND IDENTIFIED. USE EXTREME CAUTION TO AVOID CONTAMINATION OF DUCTS AND VENTS. Plug and fill all drilled holes in commonly occupied areas with a suitable sealant. Plugs must be of non-cellulose material or covered by an impervious, non-cellulose material.

Apply by trenching or trenching and rodding around the outside of the foundation wall. Apply 4 gallons of solution (see **APPLICATION VOLUME**) per 10 linear feet per foot of depth to provide a uniform treated zone. When trenching, the trench along the outside foundation must be about 6 inches wide and 6 inches deep. Use a low pressure spray to treat soil as it is being placed in the trench.

Rodding can be done from the bottom of a shallow trench. When rodding, rod holes must be spaced in a manner that will allow for a continuous treated zone, not to exceed 12 inches, to be deposited along the treated area. Rod hole depth must not extend below the footing.

BATH TRAPS: Exposed soil or soil covered with tar or a similar type sealant beneath and around plumbing and/or drain pipe entry areas must be treated with 3 gallons of solution per square foot. An access door or inspection vent must be cut and installed, if not already present. After inspection and removal of any wood or cellulose debris, the soil can be treated by rodding or drenching the soil.

CRAWL SPACES: When there is insufficient clearance between floor joists and ground surfaces to allow applicator access, excavate, if possible, and treat according to crawl spaces (refer to **PRE-CONSTRUCTION TREATMENT**). If unable to excavate, crawl space soil treatment may be used to prevent surface access by termites. Apply 1 gallon of solution (see **APPLICATION VOLUME**) per 10 square feet to provide a uniform treated zone. Use a very coarse spray at a pressure not exceeding 25 PSI at the treatment tool when the valve is open.

Where a crawl space cannot be reached with the application wand, use extension wands or other suitable equipment to apply a coarse spray on the soil, wood and structural members contacting the soil at the above rates. Do not apply to inaccessible crawl space areas using pressures greater than 25 PSI at the treatment tool when the valve is open.

Treatment may also be made by drilling through the foundation wall or through the floor above and treating the soil perimeter at a rate of 1 gallon of solution per 10 square feet. Drill spacing must be at intervals not to exceed 16

inches. Many states have smaller intervals so check state regulations which may apply.

To prevent subterranean termites from constructing mudtubes between soil and crawl space wood members above, an overall soil treatment of this product may be applied. Remove all cellulose debris before application. Apply 1 gallon of solution (see **APPLICATION VOLUME**) per 10 square feet to provide a uniform treated zone.

SHALLOW FOUNDATIONS: For shallow foundations, one foot or less in depth, dig a narrow trench approximately 6 inches wide and deep along the outside and inside of the foundation walls, being careful not to dig below the bottom of the footings. For foundations with exposed footings, dig a trench alongside the footing taking care not to undermine the footing. Apply 4 gallons of solution (see **APPLICATION VOLUME**) per 10 linear feet to the top of footer to provide a uniform treated zone. The dilution must be applied to the trench and mixed with the soil as it is placed in the trench.

BASEMENTS - OUTSIDE PERIMETER: Along the outside of the exterior walls, an application must be made by trenching or rodding within the trench. Rodding depth must be to the top of the footer, or to a minimum of 4 feet or according to state or local regulations, when rodding through a trench, dig a narrow trench about 6 inches wide and 6 inches deep. Apply 4 gallons of solution (see **APPLICATION VOLUME**) per 10 linear feet, per foot of depth to provide a uniform treated zone by rodding through the trench. Use a low pressure spray to treat soil which will be placed into the trench after rodding. Mix spray solution with the soil as it is being placed in the trench.

BASEMENTS - INSIDE PERIMETER: If necessary, treat by drilling along the perimeter of the interior walls. Applications also may be necessary around sewer pipes, floor drains, conduits, expansion joints or any cracks or holes in the basement floor. Apply 4 gallons of solution (see **APPLICATION VOLUME**) per 10 linear feet to provide a uniform treated zone.

Drill holes must be spaced in a manner that will allow for application of a continuous treated zone. Plug and fill all drill holes in commonly occupied areas of the building with a suitable sealant. Plugs must be of non-cellulose material or covered by an impervious, non-cellulose material.

HOLLOW BLOCK FOUNDATION OR VOIDS: Hollow block foundations or voids in masonry resting on the footing may be treated to provide a continuous treated zone in the voids at the footing. Apply 2 gallons of solution per 10 linear feet to the lower part of the void so that it reaches the top of the footing or soil, drill spacing must be at intervals not to exceed 16 inches. Many states have smaller intervals so check state regulations which may apply.

Treatment of voids in block or rubble foundation walls must be closely examined. Applicators must inspect areas of possible runoff as a precaution against application leakage in the treated areas. Some areas may not be treatable or may require mechanical alteration prior to treatment.

All leaks resulting in the deposition of termiticide in locations other than those prescribed on this label must be cleaned up prior to leaving the application site (refer to **PRECAUTIONARY STATEMENTS**). Do not allow people or pets to contact or to reoccupy the contaminated areas of the structure until the cleanup is completed.

PLENUMS: For plenum-type structures which use a sealed underfloor space to circulate heated and/or cooled air throughout the structure, apply the dilution at the rate of 4 gallons of solution (see **APPLICATION VOLUME**) per 10 linear feet, per foot of depth of soil to provide a uniform treated zone adjacent to both sides of foundation walls, supporting piers, plumbing and conduits. Treat soil by trenching to a depth of 6 inches or trenching and rodding (where conditions permit) or to the top of the footing. When conditions will not permit trenching or rodding, a surface application adjacent to interior foundation walls may be made, but the treated strip shall not exceed a width of 18 inches, horizontally, from the foundation walls, piers or pipes. The surface application will be made at a rate of 1.5 gallons of solution per 10 square feet as a very coarse spray under low pressure (not to exceed 25 PSI when measured at the treating tool when valve is on).

When treating plenums, turn off the air circulation system of the structure until application has been completed and all termiticide has been absorbed by the soil.

TREATMENT AROUND WELLS OR CISTERNS: Do not contaminate wells or cisterns.

Structures With Wells/Cisterns Inside Foundations: Structures that contain wells or cisterns within the foundation of a structure can only be treated using the following techniques:

1. Do not apply within 5 feet of any well or cistern by rodding and/or trenching or by the backfill method. Treat soil between 5 and 10 feet from the well or cistern by the backfill method only. Treatment of soil adjacent to water pipes within 3 feet of grade must only be done by the backfill method.

a) Trench and remove soil to be treated onto heavy plastic sheeting or similar material or into a wheelbarrow.
b) Treat the soil at the rate of 4 gallons of solution per 10 linear feet per foot of depth of the trench, or 1 gallon per 1.0 cubic feet of soil. Mix thoroughly into the soil taking care to contain the liquid and prevent runoff or spillage.
c) After the treated soil has absorbed the solution, replace the soil into the trench.

2. Treat infested and/or damaged wood in place using an injection technique such as described in the **CONTROL OF WOOD INFESTING PESTS** section of this label.

Structures With Adjacent Wells/Cisterns and/or Other Water Bodies: Applicators must inspect all structures with nearby water sources such as wells, cisterns, surface ponds, streams, and other bodies of water and evaluate, at a minimum, the treatment recommendations listed below prior to making an application.

1. Prior to treatment, if feasible, expose the water pipes coming from the well to the structure, if the pipes enter the structure within 3 feet of grade.
2. Prior to treatment applicators are advised to take precautions to limit the risk of applying the termiticide into subsurface drains that could empty into any bodies of water. These precautions include evaluating whether application of the termiticide to the top of the footer may result in contamination of the subsurface drain. Factors such as depth to the drain system and soil type and degree of compaction must be taken into account in determining the depth of treatment.
3. When appropriate (i.e., on the water side of the structure), the treated backfill technique (described above) can also be used to minimize off-site movement of termiticide.

EXTERIOR PERIMETER/INTERIOR SPOT TREATMENT*

*Not approved for use in Louisiana.

INFORMATION

Exterior Perimeter/Interior Spot Treatment is an optional method of termite treatment only for use in post-construction applications, after the final grade is established. Structural protection when using the Exterior Perimeter/Interior Spot Treatment is accomplished by: 1) establishing a continuous treated zone around the entire exterior foundation wall of the building; and 2) spot-treating infested areas on the building interior. Soil adjacent to the exterior foundation wall must be treated in the same manner as conventional (full) application. It is required that a complete and continuous treated zone be achieved around the entire exterior perimeter, including under any attached slabs such garages, porches, patios, driveways and pavement adjoining the foundation. Interior spot treatments must then be made to any indoor areas where termite activity is present. Optional interior spot treatments may also be made to high risk areas including, but not limited to plumbing and utility penetrations (including bath traps), along settlement cracks and expansion joints, and dirt-filled porches.

Exterior Perimeter/Interior Spot Treatment can be used as a preventative treatment (before structural infestation occurs) or as a curative treatment (after structural infestation occurs) in existing structures. Preventative treatment does not include pre-construction applications made to protect construction. It is required that a thorough structural inspection be completed before treatment, to locate all areas of active infestation. Spot treatment of all known sites of termite activity is required with this optional labeling. If no termite activity is observed inside the structure, interior spot treatments are not required.

EXTERIOR PERIMETER TREATMENT

It is required that all structures, regardless of the type of construction, be protected by establishing a vertical treated zone along the outer perimeter of the foundation wall. Consult the OUTER FOUNDATION WALLS section of this label (see below) for detailed directions of this treatment procedure.

1. OUTER FOUNDATION WALLS: Application must be made by trenching, or where appropriate (see below) by trenching, or trenching and rodding from the bottom of the trench, around the outside of the foundation walls. When trenching, excavate a trench along the outside foundation that is about 6 inches wide and 6 inches deep. Apply 4 gallons of solution (see APPLICATION VOLUME) per 10 linear feet, per foot of depth to provide a uniform vertical treated zone.

- For shallow foundations, one foot or less of depth, dig a narrow trench that does not exceed 6 inches wide and 6 inches deep along the outside of the foundation walls, being careful not to dig below the bottom of the footings. For foundations with exposed footings, dig a trench alongside the footing taking care not to undermine the footing.
- For basements and other foundations deeper that one foot, the application must be made by trenching and

rodding from bottom of a shallow trench. When rodding, rod holes must be spaced in a manner that will allow for a continuous treated zone, not to exceed 12 inches, to be deposited along the treated area. Rod holes must not extend below the footing. Rodding depth should be to the top of the footer, or to a maximum depth of 4 feet, or according to state or local regulations.

- For all applications, apply the solution into the trench and mix with the excavated soil as it is replaced into the trench. Use a low-pressure spray to treat soil that will be replaced into the trench after rodding. Mix spray solution with the soil as it is being replaced in the trench.

Where direct access to soil on the outer foundation wall is impossible due to attached porches, entrance platforms, garages and similar slab structures, consult the CONCRETE SLAB-ON-GROUND section of this label for directions on treatment of soil beneath these structures. However, where obstruction (e.g., concrete walkways) adjacent but not attached to foundation, or where soil type and/or conditions prevent trenching the exterior perimeter treatment may be performed at the obstructed location by rodding alone. When rodding, rod holes must be spaced in a manner that will allow for a continuous treated zone, not to exceed 12 inches, to be deposited along the treated area.

2. CONCRETE SLAB-ON-GROUND: To treat soil beneath a slab, including attached porches, carports, entrance platforms, garages and similar slab structures abutting the foundation wall, it is necessary to drill through the slab. If an infestation is associated with an expansion joint, crack, utility penetration, or similar access point in the slab, treat by drilling and injecting through the slab. Drill holes on both sides of the infested site. Apply 4 gallons of solution (see APPLICATION VOLUME) per 10 linear feet. DO NOT MAKE TREATMENT UNTIL LOCATION OF HEAT OR AIR CONDITIONING DUCT AND VENTS ARE KNOWN AND IDENTIFIED. USE EXTREME CAUTION TO NOT CONTAMINATE DUCTS AND VENTS. Plug and fill all drilled holes in commonly occupied areas with suitable sealant. Plugs must be of non-cellulose material.

3. INACCESSIBLE CRAWL SPACES: If termite activity is found along the perimeter wall or on a pier within an inaccessible crawl space, areas with termite activity must be treated. Apply 4 gallons of solution (see APPLICATION VOLUME) per 10 linear feet to create a vertical treated zone, which must extend a minimum of 3 feet on both sides of the infested site. Optional directions for horizontal rodding: Treatment may also be made by drilling through the foundation wall (or through the floor above) to treat the soil along the perimeter wall at a rate of 4 gallons of solution (see APPLICATION VOLUME) per 10 linear feet. Drill spacing must be at intervals not to exceed 16 inches. Many states have shorter intervals so check state regulations which may apply. If termite activity is neither along the perimeter wall nor on a pier within the inaccessible crawl space, to prevent subterranean termites from constructing mud tubes between soil in the crawl space and wooden elements in the structure, an overall soil treatment of this product may be applied. Remove all cellulose debris before application. Apply 1 gallon of solution (see APPLICATION VOLUME) per 10 square feet to provide a uniform treated zone.

4. ACCESSIBLE CRAWL SPACES: If termite activity is found within a accessible crawl space, the area(s) where termite activity exist must be treated by trenching, or trenching and rodding from the bottom of the trench, along the interior foundation walls, around piers, interior supports in contact with the soil, plumbing, or utility services. Apply 4 gallons of solution (see APPLICATION VOLUME) per 10 linear feet, per foot of depth, to create a vertical treated zone, which must extend a minimum of 3 feet on both sides of the infested site. Rodding may be done from the bottom of a shallow trench to the top of the footing or to a minimum depth of 4feet. When rodding, rod holes must be spaced in a manner that will allow for a continuous treated zone, not to exceed 12 inches, to be deposited along the treated area. Rod holes must not extend below the footing. When trenching, dig a narrow trench about 6 inches wide and 6 inches deep. Use a low-pressure spray to treat soil which will be placed in the trench, mixing the spray solution with soil as it is being placed in the trench.

RESTRICTION: Do not allow people or pets to contact or to reoccupy any contaminated areas of the structure until the clean-up is completed.

INTERIOR SPOT TREATMENT

Targeted applications must be made to all known infested sites inside the structure. One or more of the following application methods must be used to make interior spot treatments:

- Sub-slab injections made through the slab at or near areas where termites are known to be penetrating the slab to reach wood in the structure and/or at or near sites of active infestations. Apply 4 gallons per 10 linear feet per foot of depth. Sub-slab injections must extend to a minimum of 3 feet on either side of every known infested site at expansion joints or cracks in slabs.
- Void treatments using injection of sprays, mist or foams into above ground structural voids, termite carton nests, and other infested locations.
- Wood treatments using injection techniques and/or surface applications, to treat active infestations in structural timbers.

To maximize dispersion of treatment solution in soil and in above ground locations, the use of foam and directional dispersion tips is encouraged for all interior spot treatments. Consult section(s) of this label appropriate to the element of construction, FOAM APPLICATIONS or CONTROL OF WOOD INFESTING PESTS for detailed directions on any of these treatment procedures.

1. INTERIOR SLABS: When termite activity is located within an interior wall or structural member, the soil beneath the slab and the wall void at this site of activity must be treated. The source of infestation at an expansion joint, crack, through a utility penetration, or similar access point in the slab, must be treated by drilling and injecting through the slab. Drill holes in the slab must be spaced in a manner that will allow for application of a continuous treated zone, which must extend a minimum of 3 feet on either side of the infested site. Apply 4 gallons of solution (see APPLICATION VOLUME) per 10 linear feet. To maximize dispersion of treatment solution in soil, the use of foam and directional dispersion tips is encouraged. To treat the wall void, consult section(s) of this label appropriate to the element of construction, FOAM APPLICATIONS or CONTROL OF WOOD INFESTING PESTS for detailed directions on any of these treatment procedures. DO NOT MAKE TREATMENT UNTIL LOCATION OF HEAT OR AIR CONDITIONING DUCTS AND VENTS ARE KNOWN AND IDENTIFIED. USE EXTREME CAUTION TO NOT CONTAMINATE DUCTS AND VENTS. Plug and fill all drilled holes in commonly occupied areas with suitable sealant. Plugs must be of non-cellulose material or covered by an impervious, non-cellulose material.

2. HOLLOW BLOCK FOUNDATION OR MASONRY VOIDS: Termite activity located within hollow-block foundations or masonry voids must be treated. Spot treatment at the site(s) of termite activity must extend a minimum of 3 feet on both sides. Treat masonry voids by applying 2 gallons of solution per 10 linear feet to the lower part of the void so that it reaches the top of the footing or soil. Drill spacing in masonry voids must be at intervals not to exceed 16 inches; states may have shorter intervals so check state regulations which may apply. To maximize dispersion of treatment solution in voids, the use of foam and directional dispersion tips is encouraged. To treat structural voids above sites of termite activity in masonry, consult section(s) of this label appropriate to the element of construction, FOAM APPLICATIONS or CONTROL OF WOOD INFESTING PESTS for detailed directions on any of these treatment procedures. Treatment of voids in block or rubble foundation walls must be closely examined. Applicators must inspect areas of possible runoff as a precaution against application leakage in the treated areas. Some areas may not be treatable or may require mechanical alteration prior to treatment. All leaks resulting in the deposition of termiticide in locations other than those prescribed on this label must be cleaned up prior to leaving the application site (refer to Precautionary Statements).

Restriction: Do not allow people or pets to contact or to reoccupy the contaminated area of the structure until the clean-up is completed.

3. BATH TRAPS: If termite activity is observed within 2 feet of the bath trap, then exposed soil or soil covered with tar or similar type of sealant around plumbing and/or drain pipe entry areas must be treated. Tar or sealant may have to be removed to allow for adequate soil treatment. An access door or inspection portal should be installed if one is not present. After inspection and removal of any wood or cellulose debris, the soil can be treated by rodding or drenching the soil at the volume of no less than 3 gallons of solution per square foot.

4. SHOWER OR FLOOR DRAINS: If termite activity is observed within 2 feet of a shower of floor drain in the slab, the soil beneath the drain must be treated. Drill through the slab adjacent to the drain and use sub-slab injection to apply solution to the soil. Multiple access points may be drilled adjacent to the drain. Treat soil at a volume of 1 gallon of solution per square foot.

FOAM APPLICATIONS

Construction practices, soil subsidence and other factors may create situations in which a continuous treated zone cannot be achieved using conventional treatment alone. In situations where necessary, conventional application methods can be supplemented through use of foam generating equipment, or similar devices, to provide a continuous treated zone.

Foam application may be made alone or in combination with conventional application methods, provided that the labeled amount of active ingredient per unit area is used.

Foam Application Use Directions: Mix appropriate concentration of CSI IMIDACLOPRID + FIPRONIL SC in water and add the manufacturer's recommended quantity of foam agent to the CSI IMIDACLOPRID + FIPRONIL SC solution (see table for foaming recommendations). Apply a sufficient volume of CSI IMIDACLOPRID + FIPRONIL SC foam alone or in combination with liquid solution to provide a continuous treated zone at the labeled rate for specific application sites.

NOTE: Add the manufacturer's recommended quantity of foam agent to the CSI IMIDACLOPRID + FIPRONIL SC solution.

MIXING TABLE - CSI IMIDACLOPRID + FIPRONIL SC FOAM

CSI IMIDACLOPRID + FIPRONIL SC (mL)	GALLONS OF WATER	FOAM EXPANSION RATIO	FINISHED FOAM (0.067% ai)
160	1	20:1	20 gal
80	1	10:1	10 gal
40	1	5:1	5 gal

MIXING TABLE - CSI IMIDACLOPRID + FIPRONIL SC FOAM

CSI IMIDACLOPRID + FIPRONIL SC (fl oz)	GALLONS OF WATER	FOAM EXPANSION RATIO	FINISHED FOAM (0.067% ai)
6.9	1	25:1	25 gal
	2.5	10:1	
	5	5:1	
13.8	1	50:1	50 gal
	2.5	20:1	
	5	10:1	

Depending on the circumstances, foam applications may be used alone or in combination with liquid solution applications. Applications may be made behind veneers, piers, chimney bases, into rubble foundations, into block voids or structural voids, wall voids, under slabs, stoops, porches, or to the soil in crawlspaces, and other similar voids.

Foam and liquid applications must be consistent with volume and active ingredient instructions in order to ensure proper application has been made. The volume and amount of active ingredient are essential to an effective treatment. At least 75% of the gallons of CSI IMIDACLOPRID + FIPRONIL SC must be applied as a typical liquid treatment. The remaining 25% or fewer gallons is delivered to appropriate locations using a foam application.

NOTE: When foam is used solely to kill subterranean termites in above ground locations (such as feeding galleries in wooden framing, or in voids with framed walls), and whenever the target pest is other than subterranean termites (drywood termites, beetles, ants, etc.) dilute solutions of CSI IMIDACLOPRID + FIPRONIL SC may be expanded by foaming without concentrating the CSI IMIDACLOPRID + FIPRONIL SC solution as previously described for soil applications. Add the manufacturers' recommended volume of foaming agent to produce foam of the desired expansion ratio. Use application tips and methods suitable to the site and pest.

CONTROL OF WOOD INFESTING PESTS

For control of above ground termites and carpenter ants in localized areas, apply a 0.067% to 0.13% solution of sufficient volume of CSI IMIDACLOPRID + FIPRONIL SC foam to voids and galleries in damaged wood, and in spaces between wooden structural members and between the sill plate and foundation where wood is vulnerable. Applications may be made to inaccessible areas by drilling, and then injecting the suspension or foam with a suitable directional injector into the damaged wood or wall voids. Termite carton nests in building voids may be injected with a 0.067% to 0.13% suspension or foam. Multiple injection points to varying depths may be necessary. It is desirable to physically remove carton nest material from building voids when such nests are found. Application to man-made voids may be made with a coarse fan spray of 0.067% to 0.13% solution or foam to control exposed worker and winged reproductive forms of termites or carpenter ants. This type of application is intended to be a supplemental treatment for control of above ground subterranean termites and carpenter ants.

It is recommended to remove or prune away any shrubbery, bushes, and tree branches touching the structure. Vegetation touching the structure may offer a route of entry for ants into the structure. This may allow ants to inhabit the structure without coming in contact with the treatment. If nests are found, direct treatment of CSI IMIDACLOPRID + FIPRONIL SC can be made to theses nests.

Use a 0.067% to 0.13% solution to control existing infestations of or to prevent infestation by termites or carpenter ants in wooden poles, posts, fence posts, signs, landscape timbers and similar non-structural wood-to-soil contacts. For treating existing infestations, if possible, locate the interior infested cavity and inject a 0.067% to 0.13% solution or sufficient volume of CSI IMIDACLOPRID + FIPRONIL SC foam using an appropriate treatment tool with a splash back guard. For preventive treatment, these non-structural wood-to-soil contacts may also be treated by applying a solution to the soil as a spot application or continuous treated zone applied as a drench or by rodding around the base of the point(s) of soil contact(s). Rod holes must be placed approximately 3 inches away from the soil contact point(s) and spaced no more than 12 inches apart along the perimeter of the soil contact(s). For small poles or posts (< 6 inches in diameter), apply 1 gallon per foot of depth. For larger constructions, apply 4 gallons per 10 linear feet per foot of depth. Retreat as needed to maintain protection.

Termite carton nests in trees may be injected with a 0.067% to 0.13% solution or sufficient volume of foam using a pointed injection tool. Multiple injection points to varying depths may be necessary. Removal of carton material from trees is desirable but may not be necessary when foam application is used. **RESTRICTIONS:** Do not apply this product, by any application method, to linden, basswood or other Tilia tree species. Do not apply this product to fruit or nut bearing trees.

Drywood termites and wood-infesting beetles or borers (such as, but not limited to, powder post beetles, anobiid or deathwatch beetles, false powder post beetles, old house borers, wharf borers, or ambrosia or bark beetles). **Galleries and structure voids** can be treated with sprays, mists, or foams of a 0.067% to 0.13% CSI IMIDACLOPRID + FIPRONIL SC solution. Locate galleries by using visual signs (frass or pellets, blistered wood, emergence or clean out holes), the presence of live insects, mechanical sounding techniques, or listening devices (e.g., stethoscopes, acoustic emission detectors). Penetrate the gallery system by drilling holes to receive the injector tip or treatment tool. Distribute drill holes to adequately cover the gallery system. NOTE: Avoid drilling where electrical wiring, plumbing lines, etc. are located. Apply CSI IMIDACLOPRID + FIPRONIL SC solutions as a low pressure (about 20 psi) spray or by misting or where appropriate, by foaming. It is not necessary to treat to the point where runoff is detected from adjacent holes. RESTRICTION: Do not apply where electrical shock hazards exist. Drill holes must be sealed after treatment.

After treatment, the applicator is required to check for leaks resulting in the deposition of CSI Imidacloprid + Fipronil SC in locations other than those prescribed on this label. When found, this material must be cleaned up before leaving the application site. Do not allow people or pets to come in contact with treated areas or allow them to reoccupy the treatment site until cleanup is completed.

RETREATMENT

Retreatment for subterranean termites can only be performed if there is clear evidence of reinfestation or disruption of the treated zone due to construction, excavation, or landscaping and/or evidence of the breakdown of the treated zone in the soil. The vulnerable or reinfested areas may be retreated in accordance with application techniques described in this product's labeling. The timing and type of these retreatments will vary, depending on factors such as termite pressure, soil types, soil conditions and other factors which may reduce the effectiveness of the treated zone. Retreatment may be made as either a spot or complete treatment.

When a structure is not known to be reinfested and the treated zone is not disturbed, but where the structure was last treated five or more years ago, retreatment may be performed if, in the judgment of the applicator, it is necessary to ensure adequate protection of the structure. In determining the timing of any retreatment, the applicator must consider efficacy and/or degradation data and/or site-specific conditions and previous experience that indicate a vulnerability of the structure to termite attack.

Annual retreatment of the structure is prohibited unless there is clear evidence that reinfestation or treated zone disruption has occurred.

When another registered termite control product/system is used as the primary treatment for prevention or control of subterranean termites and is applied to all label-specified areas, CSI IMIDACLOPRID + FIPRONIL SC may be applied as a spot application in a secondary treatment to critical areas of the structure including plumbing and utility entry sites, bath traps, expansion joints, foundation cracks. The outside foundation wall, and areas of known or suspected activity at either a pre-construction or post-construction timing. These secondary treatments must be made applied in amounts and concentration in accordance with label directions relevant to the treatment area(s) to receive the secondary treatment.

DIRECTIONS FOR USE TO CONTROL LISTED PESTS ON OUTSIDE SURFACES AND ALONG FOUNDATION PERIMETER OF LISTED STRUCTURES

Listed structures are residential, institutional, commercial and industrial buildings and utility enclosures.

USE RESTRICTIONS:

- Do not allow this product to contact plants in bloom if bees are foraging the treatment area.
- Only applicators wearing the personal protective equipment required by this product label may be in the area during application.
- Do not treat within a distance of 1 foot out from the dripline of edible plants.
- Do not contaminate public or private water supplies.
- Do not apply to wasp or hornet nests if they are not attached to or within the structure.
- Do not make treatments during times of precipitation.
- Do not allow residents, children, other people or pets into the treatment area until sprays have dried. After treatment, the applicator is required to check for leaks resulting in the deposition of treatment dilution in locations other than those prescribed in this label. When found, this material must be cleaned prior to leaving the application site. Do not allow people or pets to contact contaminated areas or to reoccupy contaminated areas of the structure until clean-up is completed.
- Do not spray air conditioning units or intake vents.
- Do not use indoors except for application into wall voids.
- Do not exceed the maximum total applications per year noted in the use directions.
- Do not apply to playground equipment and pet quarters.
- Do not apply to applications to runoff or drip from treated surfaces.
- Do not apply to boat houses, including their piers or pilings.
- Do not apply within 5 feet of wells or cisterns.
- Do not apply to French drains or other permeable drainage.
- Doors and windows adjacent to application site must be closed during surface application.
- Do not apply within 15 feet of bodies of fresh water; lakes, reservoirs, rivers, permanent streams, marshes, natural ponds and commercial fish ponds. A 15- foot buffer of uniform groundcover

must exist between application zone and bodies of fresh water (uniform ground cover is defined as land which supports vegetation of greater than 2 inches in height throughout).

- Do not apply within 60 feet of estuarine bodies of water. Estuarine water bodies are brackish, tidal water bodies such as bays, mouths of rivers, salt marshes and lagoons.

- For 2' x 2' perimeter treatments: Do not apply directly to impervious horizontal surfaces such as sidewalks, and driveways. During application, do not allow pesticide to enter or run off into storm drains, drainage ditches, gutters or surface waters.

Use CSI Imidacloprid + Fipronil SC to kill and to provide residual control of the following pests:
Ants (acrobat, Argentine, big-headed, Caribbean crazy, carpenter, crazy, odorous, pavement, and thief)

Use CSI Imidacloprid + Fipronil SC to kill the following pests:
Asian lady beetles, darkling beetles
Cellar spiders
Box-elder bugs, pill bugs
Cluster flies
European earwigs
House crickets
Millipedes
Silverfish

MIXING INSTRUCTIONS
For perimeter pest treatments mix a 0.067% to 0.13% spray dilution of CSI Imidacloprid + Fipronil SC by filling the treatment tank 1/4 to 1/3 full with water, then add the 0.3 to 0.6 fluid ounces CSI Imidacloprid + Fipronil SC per finished gallon. The filling hose must be equipped with an anti-backflow device or the water flow must include an air gap to protect against back siphoning. Add the remaining water to the tank while agitating.

APPLICATIONS TO OUTSIDE SURFACES OF LISTED STRUCTURES AND INTO WALL VOIDS
Apply 0.067% to 0.13% of finished CSI Imidacloprid + Fipronil SC dilution as a low-pressure spray to the exterior of the structure where listed pests enter, trail around the structure or where they crawl and hide. Treat using a low-pressure coarse banded surface spray up to 18 inches in width around doors, windows, vents, pipes, foundation cracks, drilled holes or around any exterior opening where listed pests could enter the structure. Make sure to treat the joint where exterior siding (wood, vinyl, aluminum or other similar materials) meets the cement, brick or block foundation. Treat anywhere electrical, cable or telephone wires enter the house. This treatment must be made as a general surface spray, crack and crevice spray, or a wall void application. CSI Imidacloprid + Fipronil SC may be applied as a foam treatment into wall voids to kill and / or control the above listed pests. Refer to the **Foam Application** section of this label for specific foam mixing and application instructions.

Application to Perimeter of Listed Structures
Apply 0.067% to 0.13% of finished CSI Imidacloprid + Fipronil SC dilution as a low pressure, coarse, general surface spray along the foundation exterior perimeter. The applications may be made in a narrow band of 1 foot wide out by 1 foot wide up from where the ground meets the foundation or in a wide band of 2 feet wide out by 2 feet wide up from where the ground meets the foundation. Refer to the **Application Table for Perimeter Treatments** for the maximum number of applications permitted each year based on concentration and band width.

Application Table for Perimeter Treatments

Dilution Concentrate	Narrow Band 1 ft up by 1 ft out	Wide Band 2 ft up by 2 ft out
0.067%	8 perimeter applications/year	4 perimeter applications/year
0.13%	4 perimeter applications/year	2 perimeter applications/year

Do not exceed the specified number of applications per year.

Apply 2 quarts of 0.067% to 0.13% finished spray per 160 linear feet (approximately 1.5 gallons finished spray per 1000 square feet). Nests that are found on the ground within 2 feet of the foundation may be treated.

If treating with a finished dilution volume greater than 1 gallon of finished dilution, mix the appropriate amount of CSI Imidacloprid + Fipronil SC in the desired number of gallons of water to be applied to cover 1000 square feet. For Example: If the desired finished volume of dilution is five gallons per 1000 square feet at the high rate (0.13%), mix 0.6 fl. oz. CSI Imidacloprid + Fipronil SC for every five gallons of water in the tank.

Vegetation touching the structure may offer a route for the entry for ants into the structure without coming into contact with the treatment; therefore, it is recommended to remove or prune away any shrubbery, bushes, and tree branches touching the structure.

STORAGE AND DISPOSAL

Do not contaminate water, food or feed by storage or disposal.

Storage

Store unused product in original container only, out of reach of children and animals.

Pesticide Disposal

Pesticide wastes are acutely hazardous. Improper disposal of excess pesticide is a violation of Federal law. If these wastes cannot be disposed of by use according to label instructions, contact your State Pesticide or Environmental Control Agency, or the Hazardous Waste representative at the nearest EPA Regional Office for guidance.

Container Disposal

Nonrefillable Container: Do not reuse or refill this container. Triple rinse or pressure rinse container (or equivalent) promptly after emptying; then offer for recycling, if available, or reconditioning, if appropriate, or puncture and dispose of in a sanitary landfill, or by incineration, or by other procedures approved by state and local authorities.

Triple rinse containers small enough to shake (capacity ≤ 5 gallons) as follows: Empty the remaining contents into application equipment or a mix tank and drain for 10 seconds after the flow begins to drip. Fill the container 1/4 full with water and recap. Shake for 10 seconds. Pour rinsate into application equipment or a mix tank, or store rinsate for later use or disposal. Drain for 10 seconds after the flow begins to drip. Repeat this procedure two more times.

Pressure rinse as follows: Empty the remaining contents into application equipment or mix tank. Hold container upside down over application equipment or mix tank, or collect rinsate for later use or disposal. Insert pressure rinsing nozzle in the side of the container and rinse at about 40 PSI for at least 30 seconds. Drain for 10 seconds after the flow begins to drip.

In case of minor spills or leaks, soak up with sand, earth or other suitable material and dispose of as pesticide waste.

Control Solutions, Inc. warrants that this product conforms to the chemical description on the label thereof and is reasonably fit for purposes stated on such label only when used in accordance with directions under normal use conditions. It is impossible to eliminate all risks inherently associated with use of this product. Crop injury, ineffectiveness, or other unintended consequences may result because of such factors as weather conditions, presence of other materials, or the manner of use or application, all of which are beyond the control of Control Solutions, Inc. To the extent consistent with applicable law, Control Solutions, Inc. shall in no event be liable for consequential, special, or indirect damages resulting from the use or handling of this product. All such risks shall be assumed by the Buyer. In addition to the foregoing, no purchaser of this product (other than an end user) shall be entitled to any reimbursement for any loss suffered as a result of any suspension or cancellation of the registration for this product by

the U.S. Environmental Protection Agency. Except, as expressly provided herein and to the extent consistent with applicable law, Control Solutions, Inc. makes no warranties, guarantees, or representations of any kind, either expressed or implied, or by usage of trade, statutory or otherwise, with regard to the product sold, including, but not limited to merchantability, fitness for a particular purpose, use or eligibility of the product for any particular trade usage. The exclusive remedy of any buyer or user of this product for any and all losses, injuries, or damage resulting from or in any way arising from the use, handling, or application of this product, whether in contract, warranty, tort, negligence, strict liability, or otherwise, shall be damages not exceeding the purchase price paid for this product or, at Control Solutions, Inc. election, the replacement of this product.

Control Solutions, Inc.
5903 Genoa-Red Bluff
Pasadena, TX 77507

Additional/ Alternate Marketing Claims

- *Contains imidacloprid [a chloronicotinyl insecticide] [neonicotinoid insecticide]*
- *Contains fipronil*
- *Offers structural termite protection*

[version 08/25/2014]

* Pgs 24-25 Claimed confidential by submitter*

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

August 27, 2014

OFFICE OF CHEMICAL SAFETY
AND POLLUTION PREVENTION

LISA ADAMSON
CONTROL SOLUTIONS, INC.
5903 GENOA-RED BLUFF ROAD
PASADENA, TX 77507-1041

PRODUCT NAME: CSI Imidacloprid + Fipronil SC
COMPANY NAME: CONTROL SOLUTIONS, INC.
OPP IDENTIFICATION NUMBER:
EPA FILE SYMBOL: 53883-328
EPA RECEIPT DATE: 08/25/14

SUBJECT: RECEIPT OF AMENDMENT

DEAR REGISTRANT:

The Office of Pesticide Programs has received your application for an amendment and it has passed an administrative screen for completeness.

During the initial screen we determined that the application appears to qualify for fast track review. The package will now be forwarded to the Product Manager for review to determine its acceptability for fast track status.

If you have any questions, please contact Registration Division, Risk Management Team 1, at (703) 308-8045.

Sincerely,

Front End Processing Staff
Information Services Branch
Information Technology & Resources Management Division

Fee for Service {956806=~

This package includes the following

- ○ New Registration
- ◉ Amendment

☐ Studies? ☐ Fee Waiver?

☐ volpay % Reduction: ___

for Division

- ○ AD
- ○ BPPD
- ◉ RD

Risk Mgr. 1

Receipt No. S-	956806
EPA File Symbol/Reg. No.	53883-328
Pin-Punch Date:	8/25/2014

☑ This item is NOT subject to FFS action.

Action Code:

Requested:

Granted:

Amount Due: $ _____

Parent/Child Decisions:

☐ Inert Cleared for Intended Use ☐ Uncleared Inert in Product

Reviewer: Jennifer Gaines Date: 8/26/14

Remarks:

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON D.C., 20460

OFFICE OF CHEMICAL SAFETY AND POLLUTION PREVENTION

PC Codes: 129121, 129099
DP Barcode: D421368
July 14, 2014

MEMORANDUM

SUBJECT: Exposure and Risk Estimate Comparison of Two Fipronil Perimeter Treatments that Vary in Both Application Rate and Area Treated

TO: Venus Eagle, Lead Biologist
Insecticide Branch
Registration Division (7505P)

FROM: Ryan Mroz, Biologist
Stephen Wente, Ph.D., Biologist
Environmental Risk Branch I
Environmental Fate and Effects Division (7507P)

THROUGH: Sujatha Sankula, Ph.D., Branch Chief
Meghan Radtke, Ph.D., Acting RAPL
Environmental Risk Branch I
Environmental Fate and Effects Division (7507P)

The Registration Division (RD) requested a comparison of the exposure estimates (EECs) and risk quotients (RQs) for two fipronil perimeter treatments (Termidor SC and Control Solutions, Inc.) that vary in both application rate and area treated. The Termidor SC (EPA Reg. No. 7969-210) perimeter use has an application rate of 0.3267 lb ai/A (2 applications per year) to a 1 ft perimeter around the building measured up the side of the wall from the soil surface (referred to as "1' up") and a 1 ft perimeter measured horizontally from the wall of the building out across the soil or yard surface ("1' out"). Therefore, the entire Termidor perimeter treatment is referred to as "1' up and 1' out". Control Solutions, Inc. (CSI; EPA Reg. No. 53883-328) perimeter use has an application rate of 0.1838 lb ai/A (also 2 applications per year) to a 2' up and 2' out perimeter treatment area. **This analysis shows the CSI application would apply 14.3% more fipronil over EFED's standard residential scenario watershed than the Termidor application.**

I. Fate Profile for Fipronil

Fipronil dissipation appears to be dependent on photodegradation in water, microbially-mediated degradation, and soil binding. Data indicate that fipronil is relatively persistent and immobile in terrestrial environments. In aquatic environments, a determination of the environmental behavior of fipronil is more tentative because soil and aquatic metabolism studies provide contradictory data on fipronil's persistence to microbially-mediated degradation processes. Photolysis is expected to be a major factor in controlling fipronil dissipation in aquatic environments. Fipronil is highly bioaccumulative in fish (380× in the whole body); however, 99% of these residues were lost from the fish during the 14-day depuration period.

Fipronil degrades to form persistent and immobile degradates [fipronil sulfide (MB 45950), fipronil sulfone (MB 46136), and MB 46513]; these degradates are considered in the HED dietary tolerance expression for fipronil. Given that fipronil and its degradates have a moderate to high sorption affinity to organic carbon, it is likely that sorption to soil organic matter will limit fipronil residue movement into ground and surface waters. However, fipronil and degradate residues may have the potential to move to groundwater in very vulnerable soils (*e.g.*, coarse-textured soils with low organic matter content) and to surface water when bound to particles entrained in runoff from erodible soils.

II. Exposure Estimation

Aquatic Exposure

The Surface Water Concentration Calculator (SWCC) model was used to provide estimated environmental concentrations (EECs) of fipronil and its degradates from use around the perimeters of man-made structures in Louisiana based on a Termidor® 1' up and 1'out (EPA Reg. No. 7969-21 0) and CSI 2' up and 2'out high and low dilutions (EPA Reg. No. 53883-328) and (Tables 1 and 2). The inputs and general modeling methods used to calculate EECs followed those in the RED risk assessment (USEPA (2007) with the following modifications:

- the proposed application rates (0.3267 lb ai/A – Termidor and 0.1838 lb ai/A – CSI high dilution);
- The number of applications (two);
- Application dates of March 1st and September 1st (neither label specifies a minimum re-treatment interval);
- Updated fate data were incorporated (Table 2);
- Louisiana meteorological data was used; and
- A toxic equivalents (TEQ) approach was employed.

The TEQ approach was considered the most appropriate approach because some of fipronil's degradates are more toxic to non-target organisms than the parent fipronil. The TEQ approach allows exposure to the combination of parent and degradates to be expressed in terms of the parent alone by summing the EECs after correcting for each degradate's toxicity relative to the parent's toxicity. Conversion factors for fipronil sulfone (MB6136), MB46513, and fipronil

sulfide (MB45950) were assumed to be 23.9%, 0.96% and 4.9%, of applied parent, respectively (maximum fate study detections).

Table 1. PRZM/EXAMS Input Parameters for Fipronil and Degradates.

Parameter	Fipronil	Fipronil Sulfide	Fipronil Sulfone	MB46513
Soil K_{OC} (g/mL)	727[1] (MRID 44039003)	3911[1] (MRID 44537902)	4208[1] (MRID 44537901)	1290[1] (MRID 44262831)
Aerobic Soil Metabolism $t_{½}$ (days)	218 (MRID 42918663)	700 (Assumed)	700 (Assumed)	660 (MRID 44262830)
Aqueous Photolysis $t_{½}$ (days)	0.33 (MRID 42918661)	Stable (No data)	Stable (No data)	7 (MRID 42918661)
Hydrolysis $t_{½}$ at pH 7	Stable (MRID 42194701)	Stable (No data)	Stable (No data)	Stable (No data)
Aerobic Aquatic Metabolism $t_{½}$ (days)	33.7[2] (MRID 44661301, 44261909)	1400 (2 × ASM $t_{½}$)	1400 (2 × ASM $t_{½}$)	1400 (2 × ASM $t_{½}$)
Anaerobic Aquatic Metabolism $t_{½}$ (days)	160 (MRID 44661301, 44261909)	Stable (MRID 49151519)	Stable (MRID 49151519)	Stable (MRID 49151519)
Water Solubility (mg/L)	2.3 (MRID 47723915)	0.04 (USEPA 2007)	0.16 (MRID 44350001)	0.95 (MRID 44350002)

[1]Mean KOC value.
[2]90th percentile of the observed half-lives.
ASM = Aerobic soil metabolism.

Since the 2007 assessment, USEPA has developed a standard residential exposure scenario using a quarter acre lot and houses with a 1000 ft^2 footprints. Houses are assumed to be square with sides of 31.6 ft and a 15 ft. wide driveway to the house. Therefore, the perimeter of the house that is treated on sod or lawn (pervious surfaces) within 1 or 2 feet of the house foundation is:

$$(31.6\text{ft} \times 2\text{sides} + (31.6\text{ft}+2\text{ft}) \times 2\text{sides} - 15\text{ft driveway}) \times 1\text{ft} = 115.4\text{ft}^2 - \text{Termidor}$$
$$(31.6\text{ft} \times 2\text{sides} + (31.6\text{ft}+4\text{ft}) \times 2\text{sides} - 15\text{ft driveway}) \times 2\text{ft} = 238.8\text{ft}^2 - \text{CSI}$$

Where: 31.6 ft is the length of the house; and 2 ft or 4 ft is twice the perimeter widths to account for the additional corner areas of the perimeter.

There is an additional 1 or 2 ft of the walls of the house that is treated which has the potential to wash-off to this same area of pervious surface:

$$(31.6\text{ft} \times 4\text{sides} - 15\text{ft driveway}) \times 1\text{ft} = 111.4\text{ft}^2 - \text{Termidor}$$
$$(31.6\text{ft} \times 4\text{sides} - 15\text{ft driveway}) \times 2\text{ft} = 222.8\text{ft}^2 - \text{CSI}$$

Therefore the total area of treatment that may drain through pervious area is 226.8 ft^2 (115.4 ft^2 + 111.4 ft^2) for Termidor or 461.6 ft^2 (238.8 ft^2 + 222.8 ft^2) for CSI.

It is assumed that treatment to both horizontal and vertical surfaces (lawn, flower beds, driveway,

walls, and garage door) are available to run off the treated area. In the Termidor exposure scenario, the fraction of the watershed that is treated and expected to drain through pervious surfaces is:

$$226.8\text{ft}^2/\text{house} \times 58\text{houses/watershed} \div 1076391\text{ft}^2/\text{watershed} \times 100 = 1.222\%$$

(Termidor exposure scenario from pervious surfaces)

In the CSI exposure scenario, the fraction of the watershed that is treated and expected to drain through pervious surfaces is:

$$461.6\text{ft}^2/\text{house} \times 58\text{houses/watershed} \div 1076391\text{ft}^2/\text{watershed} \times 100 = 2.487\%$$

(CSI exposure scenario from pervious surfaces)

Additionally under the Termidor exposure scenario, the area of the side of the house that is treated (up 1 ft) and assumed to wash-off to a 15 ft wide driveway that is also treated for 1 ft out (impervious surface) is:

$$1\text{ft} \times 15\text{ft} + 1\text{ft} \times 15\text{ft} = 30\text{ft}^2$$

Therefore:

$$30\text{ft}^2/\text{house} \times 58\text{houses/watershed} \div 1076391\text{ft}^2/\text{watershed} \times 100 = 0.1617\%$$

(Termidor exposure scenario from impervious surfaces)

Similarly under the CSI exposure scenario, the area of the side of the house that is treated (up 2 ft) and assumed to wash-off to a 15 ft wide driveway that is also treated for 2 ft out (impervious surface) is:

$$2\text{ft} \times 15\text{ft} + 2\text{ft} \times 15\text{ft} = 60\text{ft}^2$$

Therefore:

$$60\text{ft}^2/\text{house} \times 58\text{houses/watershed} \div 1076391\text{ft}^2/\text{watershed} \times 100 = 0.3233\%$$

(CSI exposure scenario from impervious surfaces)

The aquatic exposure analysis EECs are somewhat different than typically produced by EFED because of the use pattern involved (residential) and the consideration of a simultaneous exposure to the parent degradates of toxicological concern. The residential exposure scenario requires the SWCC to be run twice – once for pervious surfaces and once for impervious surfaces. The toxic equivalents (TEQ) approach requires PRZM/EXAMS to be run four times for each scenario to produce EECs for fipronil and each of three degradates. The daily time series produced by these multiple model runs are post-processed to produce a high and low residential EECs that are specific for each organism group (freshwater fish, estuarine/marine fish, etc.) that EFED typically assesses (Table 2).

Table 2. Surface Water and Pore Water Fipronil TEQ Estimated Environmental Concentrations (EECs) for Proposed Perimeter Treatments

Proposed Label Use	PRZM/EXAMS Scenario[1]	Application Rate	EC_{50}-Based EEC (µg ai/L)	NOAEC-Based EEC (µg ai/L)
Freshwater Fish (surface water)				
Perimeter spray	Termidor	0.3267 lb ai/A	0.36	0.79
	CSI	0.1838 lb ai/A	0.41	0.90
Estuarine/Marine Fish (surface water)				
Perimeter spray	Termidor	0.3267 lb ai/A	0.59	0.45
	CSI	0.1838 lb ai/A	0.66	0.51
Freshwater Invertebrates (surface water)				
Perimeter spray	Termidor	0.3267 lb ai/A	0.11	0.09
	CSI	0.1838 lb ai/A	0.13	0.10
Estuarine/Marine Invertebrates (surface water)				
Perimeter spray	Termidor	0.3267 lb ai/A	0.33	0.16
	CSI	0.1838 lb ai/A	0.37	0.19
Benthic Invertebrates (pore water)				
Perimeter spray	Termidor	0.3267 lb ai/A	0.20	N/A
	CSI	0.1838 lb ai/A	0.23	N/A
Aquatic Vascular Plants (surface water)				
Perimeter spray	Termidor	0.3267 lb ai/A	0.17	0.17
	CSI	0.1838 lb ai/A	0.19	0.19
Aquatic Non-Vascular Plants (surface water)				
Perimeter spray	Termidor	0.3267 lb ai/A	0.17	0.20
	CSI	0.1838 lb ai/A	0.20	0.23

[1] 100% application efficiency, 0% drift

III. Toxicity Profile for Fipronil

The toxicity of fipronil and three of it degradates to aquatic groups is summarized in Table 3. Only the most sensitive endpoints for each taxa are reported. In some instances, endpoints were estimated (see comments column for explanations).

Table 3. Aquatic Toxicity Profile of the Most Sensitive Endpoints for Parent Fipronil and Degradates Fipronil Sulfide (MB 45950), Fipronil Sulfone (MB 46136), and MB 46513

Assessment Endpoint	Acute/ Chronic	Chemical TGAI/TEP – % ai	Species	Toxicity Value Used in Risk Assessment and Acute Toxicity Classification (If Applicable)	Citation/ MRID Classification	Comments
Freshwater fish (surrogate for aquatic-phase amphibians)	Acute	Fipronil TGAI – 100%	Bluegill sunfish (*Lepomis macrochirus*)	96-hr LC_{50} = 83 µg ai/L Very highly toxic	42918624 Acceptable	96-hr NOAEC = 43 µg ai/L (based on sublethal effects) Sublethal effects: partial/complete loss of equilibrium and lethargy
		Fipronil Sulfide (MB 45950)	NA	Assumed LC_{50} = 83 µg ai/L	NA	Assumed to be equal to the LC_{50} for parent fipronil
		Fipronil Sulfone (MB 46136) TGAI – 99.2%	Bluegill sunfish (*Lepomis macrochirus*)	96-hr LC_{50} = 25 µg ai/L Very highly toxic	42918674 Acceptable	96-hr NOAEC = 6.7 µg ai/L (based on sublethal effects) Sublethal effects: darkened pigmentation, erratic swimming behavior, partial complete loss of equilibrium, surfacing, and lethargy
		MB 46513 TGAI – 98.6%	Bluegill sunfish (*Lepomis macrochirus*)	96-hr LC_{50} = 20 µg ai/L Very highly toxic	43279702 Acceptable	96-hr NOAEC = 9.6 µg ai/L Sublethal effects: anterior extension pectoral fins, lying on the bottom of the test vessel, partial/complete loss of equilibrium, lethargy, and erratic swimming behavior
	Chronic	Fipronil TGAI – 96.7%	Rainbow trout (*Oncorhynchus mykiss*)	Early life stage 90-day NOAEC = 6.6 µg ai/L (based on reduction in larval length)	42918627 Acceptable	90-day LOAEC = 15 µg ai/L
		Fipronil Sulfide (MB 45950)	NA	Assumed NOAEC = 6.6 µg ai/L	NA	Assumed to be equal to the NOAEC for parent fipronil
		Fipronil Sulfone (MB 46136)	NA	Estimated NOAEC = 0.67 µg ai/L	NA	Estimated NOAEC using $ACR_{(rainbow\ trout)}$ for parent fipronil = $\frac{LC_{50(MB\ 46136;\ most\ sensitive\ fish\ species)}}{(LC_{50}:NOAEC_{(fipronil;\ rain\ bow\ trout)})}$ = $\frac{LC_{50(MB\ 46136;\ bluegill\ sunfish)}}{(LC_{50}:NOAEC_{(fipronil;\ rain\ bow\ trout)})}$ = 25 µg ai/L / (246 µg ai/L/6.6 µg ai/L) = 0.67 µg ai/L
		MB 46513	NA	Estimated NOAEC = 0.54 µg ai/L	NA	Estimated NOAEC using $ACR_{(rainbow\ trout)}$ for parent fipronil = $\frac{LC_{50(MB\ 46513;\ most\ sensitive\ fish\ species)}}{(LC_{50}:NOAEC_{(fipronil;\ rain\ bow\ trout)})}$ = $\frac{LC_{50(MB\ 46513;\ bluegill\ sunfish)}}{(LC_{50}:NOAEC_{(fipronil;\ rain\ bow\ trout)})}$

Assessment Endpoint	Acute/ Chronic	Chemical TGAI/TEP – % ai	Species	Toxicity Value Used in Risk Assessment and Acute Toxicity Classification (If Applicable)	Citation/ MRID Classification	Comments
						= 20 µg ai/L / (246 µg ai/L/6.6 µg ai/L) = 0.54 µg ai/L
Freshwater invertebrates	Acute	Fipronil TGAI – >98%	Black fly (*Simulium vittatum*)	LC_{50} = 0.22 µg ai/L Very highly toxic	Overmyer et al., 2005	
		Fipronil Sulfide (MB 45950) TGAI – 100%	Water flea (*Daphnia magna*)	48-hr EC_{50} = 100 µg ai/L Highly toxic	42918669 Acceptable	48-hr NOAEC < 34 µg ai/L (based on mortality) Effects: 0, 5, 10, 15, 60, 70, and 95% immobility in the negative control, solvent control, 34, 60, 100, 180, and 320 µg ai/L treatment groups; lethargy at ≥60 µg ai/L
		Fipronil Sulfone (MB 46136) TGAI – 100%	Water flea (*Daphnia magna*)	48-hr EC_{50} = 29 µg ai/L Very highly toxic	42918671 Acceptable	48-hr NOAEC < 19 µg ai/L (based on mortality and sublethal effects) Effects: 5, 5, 45, 35, 75, 90, and 100% immobility in the negative control, solvent control, 19, 31, 56, 89, and 150 µg ai/L treatment groups; lethargy and resting on the bottom
		MB 46513 TGAI – 97.8%	Water flea (*Ceriodaphnia dubia*)	LC_{50} = 43.8 µg ai/L Highly toxic	Konwick et al., 2005	
	Chronic	Fipronil	NA	Estimated NOAEC = 0.011 µg ai/L	NA	Estimated NOAEC using lowest $LC_{50(fipronil;\ FW\ invert)}$ and $ACR_{(fipronil;\ D.\ magna)}$ = $LC_{50(fipronil;\ black\ fly)}$ / $ACR_{(fipronil;\ D.\ magna)}$ = 0.22 µg ai/L / (190 µg ai/L/9.8 µg ai/L) = 0.011 µg ai/L
		Fipronil Sulfide (MB 45950)	NA	Estimated NOAEC = 0.11 µg ai/L	NA	Estimated NOAEC using lowest $LC_{50\ (MB\ 45950;\ FW\ invert)}$ and $ACR_{(fipronil;\ black\ fly)}$ =$LC_{50(MB\ 45950;\ D.\ magna)}$ / $ACR_{(fipronil;\ D.\ magna)}$ =2.13 µg ai/L / (0.22 µg ai/L/0.011 µg ai/L) =0.11 µg ai/L
		Fipronil Sulfone (MB 46136)	NA	Estimated NOAEC = 0.037 µg ai/L	NA	Estimated NOAEC using lowest $LC_{50(MB\ 46136;\ FW\ invert)}$ and $ACR_{(fipronil;\ black\ fly)}$ =$LC_{50(MB\ 46136;\ D.\ magna)}$ / $ACR_{(fipronil;\ D.\ magna)}$ =0.72 µg ai/L / (0.22 µg ai/L/0.011 µg ai/L) =0.037 µg ai/L

Assessment Endpoint	Acute/ Chronic	Chemical TGAI/TEP – % ai	Species	Toxicity Value Used in Risk Assessment and Acute Toxicity Classification (If Applicable)	Citation/ MRID Classification	Comments
		MB 46513 TGAI – 97.81%	Water flea (*Daphnia magna*)	21-day NOAEC = 41 µg ai/L (based on reduction in length and weight)	43279704 and 44812801 Acceptable	21-day NOAEC = 100 µg ai/L Other effects: reduction in survival a 260 µg ai/L
Estuarine/ marine fish	Acute	Fipronil TGAI – 96.1%	Sheepshead minnow (*Cyprinodon variegatus*)	96-hr LC_{50} = 130 µg ai/L Highly toxic	43291702 Acceptable	96-hr NOAEC < 110 µg ai/L (based on sublethal effects) Sublethal effects: erratic swimming behavior, partial/complete loss of equilibrium
		Fipronil Sulfide (MB 45950)	NA	Estimated LC_{50} = 130 µg ai/L	NA	Assumed to be equal to the LC_{50} for parent fipronil
		Fipronil Sulfone (MB 46136)	NA	Estimated LC_{50} = 21 µg ai/L	NA	Estimated LC_{50} using $LC_{50(fipronil;\ sheepshead\ minnow)}$ and largest $LC_{50(fipronil;\ FW\ fish)}$:$LC_{50(MB46136;\ FW\ fish)}$ = $LC_{50(fipronil;\ sheepshead\ minnow)}$ / $LC_{50(fipronil;\ rainbow\ trout)}$:$LC_{50(MB46136;\ rainbow\ trout)}$ = 130 µg ai/L / (246 µg ai/L/39 µg ai/L) = 21 µg ai/L
		MB 46513	NA	Estimated LC_{50} = 31 µg ai/L	NA	Estimated LC_{50} using $LC_{50(fipronil;\ sheepshead\ minnow)}$ and largest $LC_{50(fipronil;\ FW\ fish)}$:$LC_{50(MB\ 46513;\ FW\ fish)}$ = $LC_{50(fipronil;\ sheepshead\ minnow)}$ / $LC_{50(fipronil;\ bluegill\ sunfish)}$:$LC_{50(MB\ 46513;\ bluegill\ sunfish)}$ = 130 µg ai/L / (83 µg ai/L/20 µg ai/L) = 31 µg ai/L
	Chronic	Fipronil TGAI – 97.08% Radiolabeled – 99.4%	Sheepshead minnow (*Cyprinodon variegatus*)	NOAEC = 0.24 µg ai/L (based on reduction in length and weight)	446085502 Acceptable	LOAEC = 0.41 µg ai/L Other effects: reduction in egg hatching at 2.9 µg ai/L
		Fipronil Sulfide (MB 45950)	NA	Assumed NOAEC = 0.24 µg ai/L	NA	Assumed to be equal to the NOAEC for parent fipronil
		Fipronil Sulfone (MB 46136)	NA	Estimated NOAEC = 0.039 µg ai/L	NA	Estimated NOAEC using Estimated $LC_{50(MB\ 46136;\ E/M\ fish)}$ and $ACR_{(fipronil;\ sheepshead\ minnow)}$ = 21 µg ai/L / (130 µg ai/L/0.24 µg ai/L) = 0.039 µg ai/L
		MB 46513	NA	Estimated NOAEC = 0.057 µg ai/L	NA	Estimated NOAEC using Estimated $LC_{50(MB\ 46513;\ E/M\ fish)}$ and $ACR_{(fipronil;\ sheepshead\ minnow)}$ = 31 µg ai/L / (130 µg ai/L/0.24 µg ai/L) = 0.057 µg ai/L

Assessment Endpoint	Acute/ Chronic	Chemical TGAI/TEP – % ai	Species	Toxicity Value Used in Risk Assessment and Acute Toxicity Classification (If Applicable)	Citation/ MRID Classification	Comments
Freshwater sediment dwelling invertebrates	Acute	Fipronil TGAI – 98.3%	Midge (*Chironomus tentans*)	Sediment exposure Sediment 10-day NOAEC = 16 µg ai/kg-sediment Pore water 10-day NOAEC = 0.24 µg ai/L Overlying water 10-day NOAEC = < 0.056 µg ai/L (based on mortality)	45878001 Acceptable	Sediment 10-day LC_{50} = 30.7 µg ai/kg-sediment Pore water 10-day LC_{50} = 0.41 µg ai/L raw data not submitted for weight; study author-reported endpoint for growth (weight): 10-day EC_{50} = 50 µg ai/kg-sediment
		Fipronil Sulfide (MB 45950) TGAI – 99.5%	Midge (*Chironomus tentans*)	Sediment exposure Sediment 10-day NOAEC = 29 µg ai/kg-sediment Pore water 10-day NOAEC = 0.35 µg ai/L Overlying water 10-day NOAEC = 0.013 µg ai/L (based on mortality)	45084801 Acceptable	Sediment 10-day NOAEL = 54 µg ai/kg-sediment (based on growth) 10-day EC_{50} = 50.9 µg ai/kg-sediment (based on growth) 10-day LC_{50} = 116.9 µg ai/kg-sediment Pore water 10-day NOAEL = 0.94 µg ai/L (based on growth) 10-day EC_{50} = 0.66 µg ai/L (based on growth) 10-day LC_{50} = 2.13 µg ai/L Overlying water 10-day NOAEL = 0.022 µg ai/L (based on growth)
		Fipronil Sulfone (MB 46136)	Midge (*Chironomus tentans*)	Sediment exposure Sediment	45175901 Acceptable	Sediment 10-day EC_{50} = 34.8 µg ai/kg-sediment (based on growth)

Assessment Endpoint	Acute/ Chronic	Chemical TGAI/TEP – % ai	Species	Toxicity Value Used in Risk Assessment and Acute Toxicity Classification (If Applicable)	Citation/ MRID Classification	Comments
		TGAI – 99.01%		10-day NOAEC = 9.1 µg ai/kg-sediment Pore water 10-day NOAEC = 0.073 µg ai/L Overlying water 10-day NOAEC = 0.0052 µg ai/L (based on growth)		10-day NOAEL = 14 µg ai/kg-sediment (based on mortality) 10-day LC_{50} = 44.8 µg ai/kg-sediment Pore water 10-day EC_{50} = 0.41 µg ai/L (based on growth) 10-day NOAEL = 0.30 µg ai/L (based on mortality) 10-day LC_{50} = 0.72 µg ai/L Overlying water 10-day NOAEL = 0.0069 µg ai/L (based on mortality)
		MB 46513 TGAI – 97.8% Radiolabeled – 99.1-99.6%	Midge (*Chironomus tentans*)	Sediment exposure Sediment 10-day NOAEC = < 185 µg ai/kg-sediment (based on growth)	45375901 Supplemental (due to unreliable pore water concentrations)	Sediment 10-day EC_{50} = 520 µg ai/kg-sediment (based on growth) 10-day NOAEL = 185 µg ai/kg-sediment (based on mortality) 10-day LC_{50} = 1300 µg ai/kg-sediment
	Chronic	MB 45950 Radiolabeled – 99.5%	Midge (*Chironomus riparius*)	Sediment 28-day NOAEC = 1.85 µg TTR/kg-dw sediment Overlying water 28-day NOAEC = 0.015 µg TTR/L (based on emergence and development rates)	45851001 Supplemental (non-guideline)	NOAEC = 1.1* µg/kg-dw sediment (day -10 conc.) (based on lethargy) *may be an overestimated NOAEC as the concentration was not measured on days 0 and 28 at this treatment level

Assessment Endpoint	Acute/ Chronic	Chemical TGAI/TEP – % ai	Species	Toxicity Value Used in Risk Assessment and Acute Toxicity Classification (If Applicable)	Citation/ MRID Classification	Comments
Estuarine/ marine invertebrates	Acute	Fipronil TGAI – 96.1%	Mysid shrimp (*Americamysis bahia*)	96-hr LC_{50} = 0.140 µg ai/L Very highly toxic	43279701 Acceptable	96-hr NOAEC < 62 µg ai/L
		Fipronil Sulfide (MB 45950) TGAI – 99.7%	Mysid shrimp (*Americamysis bahia*)	96-hr LC_{50} = 0.077 µg ai/L Very highly toxic	45156302 Acceptable	96-hr NOAEC = 33 µg ai/L Sublethal effects: None
		Fipronil Sulfone (MB 46136) TGAI – 99.7%	Mysid shrimp (*Americamysis bahia*)	96-hr LC_{50} = 0.056 µg ai/L Very highly toxic	45165301 Acceptable	96-hr NOAEC = 0.031 µg ai/L Sublethal effects: None
		MB 46513 TGAI – 97.8%	Mysid shrimp (*Americamysis bahia*)	96-hr LC_{50} = 1.5 µg ai/L Very highly toxic	45120001 Acceptable	96-hr NOAEC = 0.66 µg ai/L
		Fipronil TGAI – 96.1%	Eastern oyster (*Crassostrea virginica*)	96-hr EC_{50} = 770 µg ai/L Highly toxic	43291701 Acceptable	Sublethal effects: reduced fecal and pseudofecal production at 1.2 µg ai/L
	Chronic	Fipronil TGAI – 97.7%	Mysid shrimp (*Americamysis bahia*)	28-day NOAEC < 0.005 µg ai/L (based on reduction in male weight)	43681201 Supplemental (due to lack of a NOAEC)	28-day LOAEC = <0.005 µg ai/L Other effects: reduction in male length at ≥15 µg ai/L; reduction in female weight and length at 57 and ≥28 µg ai/L, respectively; reduction in reproduction and F1 survival at 57 µg ai/L
		Fipronil Sulfide (MB 45950) TGAI – 99.5%	Mysid shrimp (*Americamysis bahia*)	28-day NOAEC = 0.0046 µg ai/L (based on reduction in male weight)	45259202 Supplemental (due to the lack of a solvent control)	28-day LOAEC = 0.0087 µg ai/L Other effects: reduction in reproduction, F1 survival, male length and female weight at 35 µg ai/L
		Fipronil Sulfone (MB 46136) TGAI – 99%	Mysid shrimp (*Americamysis bahia*)	28-day NOAEC < 0.0026 µg ai/L (based on reduction in female weight)	45259203 Supplemental (due to the lack of a NOAEC and solvent control)	28-day LOAEC = 0.0026 µg ai/L Other effects: reduction in male weight at ≥9.3 µg ai/L; reduction in reproduction and male length at ≥19 µg ai/L
		MB 46513	NA	Estimated NOAEC = 0.054 µg ai/L	NA	Estimated NOAEC using lowest $LC_{50(MB\ 46513;\ SW\ invert)}$ and $ACR_{(fipronil;\ A.\ bahia)}$

Assessment Endpoint	Acute/ Chronic	Chemical TGAI/TEP – % ai	Species	Toxicity Value Used in Risk Assessment and Acute Toxicity Classification (If Applicable)	Citation/ MRID Classification	Comments
						= $LC_{50(MB\ 46513;\ A.\ bahia)}$ / $ACR_{(fipronil;\ A.\ bahia)}$ = 1.5µg ai/L / (0.140 µg ai/L/0.005µg ai/L) = 0.054µg ai/L
Aquatic plants	Vascular	Fipronil TGAI – 96.1%	Duckweed (*Lemna gibba*)	14-day EC_{50} > 100 µg ai/L 14-day NOAEC = 100 µg ai/L (based on number of fronds and dry weight)	42918656 Acceptable	
		Fipronil Sulfide (MB 45950)	NA	Assumed EC_{50} > 100 µg ai/L Assumed NOAEC = 100 µg ai/L	NA	Assumed to be equal to the EC_{50} and NOAEC for parent fipronil
		Fipronil Sulfone (MB 46136)	NA	Assumed EC_{50} > 100 µg ai/L Assumed NOAEC = 100 µg ai/L	NA	Assumed to be equal to the EC_{50} and NOAEC for parent fipronil
		MB 46513	NA	Assumed EC_{50} > 100 µg ai/L Assumed NOAEC = 100 µg ai/L	NA	Assumed to be equal to the EC_{50} and NOAEC for parent fipronil
	Non-vascular	Fipronil TGAI – 96.1%	Freshwater diatom (*Navicula pelliculosa*)	5-day EC_{50} > 120 µg ai/L 5-day NOAEC = 120 µg ai/L (based on cell density)	42918658 Acceptable	
		Fipronil Sulfide (MB 45950)	NA	Assumed EC_{50} > 120 µg ai/L Assumed NOAEC = 120 µg ai/L	NA	Assumed to be equal to the EC_{50} and NOAEC for parent fipronil
		Fipronil Sulfone (MB 46136)	NA	Assumed EC_{50} > 120 µg ai/L Assumed NOAEC = 120 µg ai/L	NA	Assumed to be equal to the EC_{50} and NOAEC for parent fipronil
		MB 46513 TGAI – 98.6%	Green alga (*Selenastrum capricornutum*)	5-day EC_{50} = 76 µg ai/L 5-day EC_{05} = 7.5 µg ai/L (based on cell density)	43279705 Acceptable	Effects: Statistically-significant reductions in cell density at all concentrations tested; 5-day NOAEC < 12 µg ai/L

The toxicity of fipronil and degradates MB 45950 and MB 46136 to terrestrial taxa are reported in Table 4. Quantitative data for honeybees were not available; however, some qualitative data were available from the open literature. Mayer and Lunden (1999) (ECOTOX #62630) determined contact 24-hr LD_{50}s for three species of bees: alkali bee (*Nomia melanderi*), honeybee (*Apis mellifera*), and alfalfa leafcutter bee (*Megachile rotundata*). The corresponding LD_{50}s were 1.130 µg ai/bee for the alkali bee, 0.013 µg ai/bee for the honeybee, and 0.004 µg ai/bee for the alfalfa leafcutter bee. A second study, Oliveira Jacob *et al.* (2013), calculated a contact (24-hr LD_{50} = 0.54 ng ai/bee) and dietary (24-hr LC_{50} = 0.24 ng ai/µL-diet) toxicity endpoint for the stingless bee (*Scaptotrigona postica*). Neither study used a negative control, although both studies had solvent (acetone) controls. Mortality data for the solvent control was not reported; thus these studies can only be used qualitatively to characterize the toxicity of fipronil to terrestrial invertebrates.

Table 4. Terrestrial Toxicity Profile for Parent Fipronil and Degradates Fipronil Sulfide (MB 45950), Fipronil Sulfone (MB 46136), and MB 46513

Assessment Endpoint	Acute/ Chronic	Chemical TGAI/TEP – % ai	Species	Toxicity Value Used in Risk Assessment and Acute Toxicity Classification (If Applicable)	Citation or MRID # Classification	Comment
Birds (surrogate for terrestrial-phase amphibians and reptiles)	Acute single oral dose	Fipronil TGAI – 96%	Bobwhite quail (*Colinus virginianus*)	21-day LD_{50} = 11.3 mg ai/kg-bw Highly toxic	42918617 Acceptable	21-day NOAEL < 1 mg ai/kg-bw (based on reduction in food consumption during the first 3 days) Sublethal effects: at ≥4.64 mg ai/kg-bw, lethargy, moving the head from side to side when disturbed, chalky diarrhea, anorexia, stumbling, ataxia, tremors, tachypnea, wing-beat convulsions, tetany, spasms, loss of balance, piloerection, sitting, failure to respond to external stimuli, gasping for breath, noticeable weight loss, the appearance of weakness or listlessness, and death; remission achieved by day 18; reduction in body weight at 4.46 and 10 mg ai/kg-bw on days 3, 7, and 14; reductions in body weight before death at 21.5 and 46.4 mg ai/kg-bw; dose-dependent reduction in food consumption during the first 3 days of the test for all treatment groups; reduction in food consumption continued through day 7 at 4.64 mg ai/kg-bw and through day 14 at 10 and 21.5 mg ai/kg-bw
		Fipronil Sulfide (MB 45950)	NA	Estimated LD_{50} = 26.8 mg ai/kg-bw	NA	Estimated LD_{50} using $Acute_{(oral)}$-to-$Acute_{(dietary)}$ Ratio = LD_{50}:$LC_{50(most\ sensitive\ avian\ species)}$*$LC_{50(MB\ 45960)}$ = LD_{50}:$LC_{50(bobwhite\ quail)}$*$LC_{50(MB\ 45960)}$ = (11.3 mg a.i./kg-bw/48 mg ai/kg-diet)*114 mg ai/kg-diet = 26.8 mg ai/kg-bw
		Fipronil Sulfone (MB 46136)	NA	Estimated LD_{50} = 19.7 mg ai/kg-bw	NA	Estimated LD_{50} using $Acute_{(oral)}$-to-$Acute_{(dietary)}$ Ratio = LD_{50}:$LC_{50(most\ sensitive\ avian\ species)}$*$LC_{50(MB\ 45960)}$ = LD_{50}:$LC_{50(bobwhite\ quail)}$*$LC_{50(MB\ 43136)}$ = (11.3 mg ai/kg-bw/48 mg ai/kg-diet)*84 mg ai/kg-diet = 19.7 mg ai/kg-bw.
		MB 46513 TGAI – 98.6%	Bobwhite quail (*Colinus virginianus*)	21-day LD_{50} = 5 mg ai/kg-bw Highly toxic	43776601 Acceptable	21-day NOAEL = 3.16 mg ai/kg-bw (based on a reduction in body weight) Sublethal effects: reduction in feed consumption at ≥ 3.16 mg a.i./kg-bw; reduction in body weight on day 7 at ≥14.7 mg a.i./kg-bw

Assessment Endpoint	Acute/ Chronic	Chemical TGAI/TEP – % ai	Species	Toxicity Value Used in Risk Assessment and Acute Toxicity Classification (If Applicable)	Citation or MRID # Classification	Comment
	Sub-acute dietary	Fipronil TGAI – >95%	Bobwhite quail (*Colinus virginianus*)	21-day* = 48 mg ai/kg-diet *5-day exposure; 17-day post-exposure observation Very highly toxic	42918620 Acceptable	21-day NOAEC = 19 mg ai/kg-diet (based on mortality and sublethal effects) Sublethal effects: lethargy, white-colored diarrhea, and anorexia at ≥39 mg ai/kg-diet (remission of survivors at 39 mg ai/kg-diet by end of day 6); reduction in body weight on day 22 at 39 mg ai/kg-diet
		Fipronil Sulfide (MB 45950) TGAI – 98.8%	Bobwhite quail (*Colinus virginianus*)	8-day LC_{50} = 114 mg ai/kg-diet Highly toxic	44890302 Acceptable	8-day NOAEC = 17.8 mg ai/kg-diet (based on sublethal effects) Effects: 0, 0, 10, 0, 0, 30, 100% mortality in the control, 10.0, 17.8, 31.6, 56.2, 100 and 178 mg ai/kg-diet treatment groups; ruffled appearance, wing droop, lethargy, depression, reduced reaction to external stimuli, convulsion, shallow and rapid respiration, and loss of coordination at ≥31.6 mg ai/kg-diet; dose-dependent reduction in body weight gain at 56.2 and 100 mg ai/kg-diet; treatment-related reduction in food consumption at ≥100 mg ai/kg-diet
		Fipronil Sulfone (MB 46136) TGAI – 99.7%	Bobwhite quail (*Colinus virginianus*)	8-day LC_{50} = 84 mg ai/kg-diet Highly toxic	44890301 Acceptable	8-day NOAEC = 17.8 mg ai/kg-diet (based on sublethal effects) Sublethal effects: ruffled appearance, wing droop, lethargy, convulsions, reduced reaction to external stimuli, lower limb weakness, loss of coordination and protracted posture at ≥ 31.6 mg ai/kg-diet; dose-dependent reduction in body weight gain at 56.2 mg ai/kg-diet and weigh loss at ≥100 mg ai/kg-diet
		MB 46513 TGAI – 97.8	Bobwhite quail (*Colinus virginianus*)	8-day LC_{50} = 119.2 mg ai/kg-diet Highly toxic	45259201 Acceptable	8-day NOAEC < 18.6 mg ai/kg-diet (based on sublethal effect of body weight gain between days 0 and 5) Sublethal effects: dose-dependent reduction in body weight gain or loss from days 0 to 5 at treatment levels where total mortality did not occur (*i.e.*, 18.6-49.3 mg ai/kg-diet); reduction in feed consumption from days 0 to 5 at 126 mg ai/kg-diet; ruffled appearance, lethargy, wing droop, loss of coordination, tremors, reduced response to stimuli at ≥49.3 mg ai/kg-diet
	Chronic	Fipronil TGAI – 96.7%	Bobwhite quail (*Colinus virginianus*)	142-day NOAEC = 10 mg ai/kg-diet (no treatment-related effects)	42918622 Supplemental (due to no effects	142-day LOAEC > 10 mg ai/kg-diet Effects: statistically-significant increases in cracked eggs and

Assessment Endpoint	Acute/ Chronic	Chemical TGAI/TEP – % ai	Species	Toxicity Value Used in Risk Assessment and Acute Toxicity Classification (If Applicable)	Citation or MRID # Classification	Comment
					at concentrations tested)	decreases in male body weight at 0.2 and 2 mg ai/kg-diet were not considered treatment-related because there was no effect at 10 mg ai/kg-diet
		Fipronil Sulfide (MB 45950)	NA	Assumed NOAEC = 10 mg ai/kg-diet	NA	Assumed to be equal to the NOAEC for parent fipronil
		Fipronil Sulfone (MB 46136)	NA	Assumed NOAEC = 10 mg ai/kg-diet	NA	Assumed to be equal to the NOAEC for parent fipronil
		MB 46513	NA	Assumed NOAEC = 10 mg ai/kg-diet	NA	Assumed to be equal to the NOAEC for parent fipronil
Mammals	Acute single oral dose	Fipronil TGAI – 93%	Rat	Combined sexes 15-day LD_{50} = 97 mg ai/kg-bw Males 15-day LD_{50} = 92 mg ai/kg-bw Females 15-day LD_{50} = 103 mg ai/kg-bw Moderately toxic	42918628	Sublethal effects: pilo-erection, diarrhea, abnormal body carriage (hunched posture), and abnormal gait (waddling) at ≥50 mg/kg-bw; lethargy at ≥80 mg/kg-bw; decreased respiratory rate in1 male at 80 mg/kg-bw and all individuals at 200 mg/kg-bw; ptosis, pallor of extremities, clonic convulsions, and prostrate stature at 200 mg ai/kg-bw; low body weight gain on day 8 for up to 2 females at each treatment level and for all males surviving treatment; with the exception of one female at 50 mg/kg which showed a slightly low body weight gain, all survivors achieved anticipated body weight gains by study termination
		Fipronil Sulfide (MB 45950)	Rat	LD_{50} = 83 mg ai/kg-bw Moderately toxic	HED memo[a]	
		Fipronil Sulfone (MB 46136) TGAI – 98%	Rat	LD_{50} = 218 mg/kg-bw Moderately toxic	42918675	
		MB 46513	Rat	LD_{50} = 16 mg ai/kg-bw Highly toxic	43235402	
	Chronic	Fipronil	Rat	Reproductive NOAEL = 2.5 mg ai/kg-bw/day NOAEC = 30 mg ai/kg-diet (based on clinical signs, decreased litter size, decreased body weight, decreased mating, decreased fertility index,	42918647	Parental/Systemic NOAEL = 0.25 mg ai/kg-bw/day LOAEL = 2.5 mg ai/kg-bw/day (based on: male/female increased thyroid and liver weights, and female decreased pituitary weight and increased follicular epithelial hypertrophy)

Assessment Endpoint	Acute/ Chronic	Chemical TGAI/TEP – % ai	Species	Toxicity Value Used in Risk Assessment and Acute Toxicity Classification (If Applicable)	Citation or MRID # Classification	Comment
				decreased post-implant survival and offspring postnatal survival, and delayed physical development)		Reproductive LOAEL = 26 mg ai/kg-bw/day Offspring NOAEL = 26 mg ai/kg-bw/day LOAEL = >26 mg ai/kg-bw/day
		Fipronil Sulfide (MB 45950)	NA	NOAEL = 2.5 mg ai/kg-bw/day NOAEC = 30 mg ai/kg-diet	NA	Assumed to be equal to the NOAEC for parent fipronil
		Fipronil Sulfone (MB 46136)	NA	NOAEL = 2.5 mg ai/kg-bw/day NOAEC = 30 mg ai/kg-diet	NA	Assumed to be equal to the NOAEC for parent fipronil
		MB 46513	NA	NOAEL = 2.5 mg ai/kg-bw/day NOAEC = 30 mg ai/kg-diet	NA	Assumed to be equal to the NOAEC for parent fipronil
Terrestrial plants	Seedling emergence	Fipronil TGAI – 80.3%	Oat (*Avena sativa*) Oilseed rape (*Brassica napus*)	Monocot (oat) EC25: 3.49 mg a.i./kg-dry soil (7.1 lb ai/A) EC05: 0.00563 mg a.i./kg-dry soil (0.011 lb ai/A) NOEC: <0.125 mg a.i./kg-dry soil Based on wet weight Dicot (oilseed rape) EC25: 2.27 mg a.i./kg-dry soil (4.62 lb ai/A) NOEC: 0.5 mg a.i./kg-dry soil (1.02 lb ai/A) Based on wet weight	48599701 Supplemental (subset of required species were tested and monocot NOAEC not established)	

[a] Fipronil - Review of toxicity studies (28-day studies with fipronil and metabolite RPA 200766, a developmental neurotoxicity study with fipronil and a paper on the toxicological significance of fipronil and its metabolites). From V.A. Dobozy (Registration Branch 1/HED) to M. Johnson (RD), 8/6/1997

IV. Risk Estimation

Risk to Aquatic Taxa

The following risks to aquatic taxa are identified for both the Termidor and CSI perimeter treatment scenarios. Acute non-listed species LOCs (0.5) were exceeded for all aquatic invertebrates (freshwater, benthic, and estuarine/marine). Chronic RQs exceeded the listed and non-listed species LOC (1) for estuarine/marine fish and freshwater invertebrates. Chronic risk quotients could not be calculated for estuarine/marine invertebrates because the toxicity data were non-definitive. In lieu of this, the toxicity value (<0.005 µg ai/L) was compared directly with the NOAEC-based EECs for estuarine/marine invertebrates (0.17 and 0.19 µg ai/L). Given that the EECs are higher than 0.005 µg ai/L, risk concerns are likely for estuarine/marine invertebrates. Likewise, definitive data were not available for non-listed aquatic vascular plants (>100 µg ai/L) and non-listed non-vascular aquatic plants (>120 µg ai/L). When compared directly with the EECs (vascular aquatic: 0.18 to 0.20 µg ai/L; non-vascular aquatic: 0.21 to 0.24 µg ai/L); the EECs are several order of magnitude lower than the toxicity values. Consequently, risk concerns for aquatic vascular and non-vascular plants are not expected. For benthic invertebrates, chronic toxicity data were not available. Given that chronic risk concerns were identified for both freshwater and estuarine/marine invertebrates, chronic risk is assumed for benthic invertebrates as well.

In summary, risk concerns were identified for estuarine/marine fish (chronic only), freshwater invertebrates, estuarine/marine invertebrates, and benthic invertebrates. Risk concerns were not identified for freshwater fish, estuarine/marine fish (acute only), vascular aquatic plants, and non-vascular aquatic plants (Table 5 and 6).

Table 5. Acute and Chronic Risk Quotients for Aquatic Taxa (Excluding Plants)

Scenario	EC_{50} or LC_{50} (µg ai/L)	NOAEC (µg ai/L)	EC_{50} or LC_{50}-based EEC (µg ai/L)	NOAEC-based EEC (µg ai/L)	Acute RQ	Chronic RQ
Freshwater fish (surface water)						
Termidor	83	6.6	0.36	0.79	0.004	0.12
CSI	83	6.6	0.41	0.90	0.005	0.14
Estuarine/marine fish (surface water)						
Termidor	130	0.24	0.59	0.45	0.005	**1.88*** **
CSI	130	0.24	0.66	0.51	0.005	**2.13*** **
Freshwater invertebrates (surface water)						
Termidor	0.22	0.011	0.11	0.09	**0.50****	**8.18*** **
CSI	0.22	0.011	0.13	0.10	**0.59****	**9.09*** **
Estuarine/marine invertebrates (surface water)						
Termidor	0.140	<0.005	0.33	0.16	**2.36****	ND
CSI	0.140	<0.005	0.37	0.19	**2.64****	ND

Scenario	EC_{50} or LC_{50} (µg ai/L)	NOAEC (µg ai/L)	EC_{50} or LC_{50}-based EEC (µg ai/L)	NOAEC-based EEC (µg ai/L)	Acute RQ	Chronic RQ
Freshwater benthic organisms (pore water)						
Termidor	0.24	N/A	0.20	N/A	**0.83****	N/A
CSI	0.24	N/A	0.23	N/A	**0.96****	N/A

N/A – chronic toxicity data were not available for EEC calculation and RQ derivation
ND – data were non-definitive and a RQ could not be calculated
* Exceeds acute listed species LOC (0.05)
** Exceeds acute non-listed species LOC (0.5)
*** Exceeds chronic LOC (1.0)

Table 6. Acute and Chronic Risk Quotients for Aquatic Plants

Scenario	EC_{50} or LC_{50} (µg ai/L)	NOAEC (µg ai/L)	EC_{50} or LC_{50}-based EEC (µg ai/L)	NOAEC-based EEC (µg ai/L)	Listed Species RQ	Non-Listed Species RQ
Vascular aquatic plants (surface water)						
Termidor	>100	100	0.17	0.17	ND	0.002
CSI	>100	100	0.19	0.19	ND	0.002
Non-vascular plants (surface water)						
Termidor	>120	120	0.17	0.20	ND	0.002
CSI	>120	120	0.20	0.23	ND	0.002

ND – data were non-definitive and a RQ could not be calculated

V. Conclusions

The CSI application rate (0.1838 lb ai/A) is approximately 56.3% of the Termidor application rate (0.3267 lb ai/A). If the CSI application area (2' up by 2' out) was exactly twice the Termidor application area (1' up by 1' out), the CSI application would apply 12.5% more fipronil around each structure. Because a 2' up by 2' out treatment area is slightly larger than twice the 1' up by 1' out due to additional corner area in the 2' out portion of the perimeter treatment, the CSI treatment area is 203.1% of the Termidor treatment area. Therefore, the CSI application would apply 14.3% more fipronil over EFED's standard residential scenario watershed than the Termidor application.

Pages 47-48 Privileged attorney-client communication

Pages 49-56 Claimed confidential by submitter

CONTROL SOLUTIONS incorporated
A Makhteshim-Agan Company

February 28, 2014

Venus Eagle, PM 1
Office of Pesticide Programs (7504P)
U.S. Environmental Protection Agency
Document Processing Desk
Room S-4900, One Potomac Yard
2777 South Crystal Drive
Arlington, VA 22202

Subject: Submission of Final Printed Label
CSI Imidacloprid + Fipronil SC (EPA Registration Number 53883-328)

Dear Ms. Eagle:

Control Solutions, Inc. (CSI, 5903 Genoa Red Bluff, Pasadena, TX 77507-1041, EPA Company Number 53883), is submitting a final printed label to EPA in response to the EPA Notice of Registration for CSI Imidacloprid + Fipronil SC (EPA Registration Number 53883-328) dated November 7, 2013. Please find enclosed the following documentation in support of this submission:

- Transmittal Document (this letter);
- Application for Pesticide Registration (EPA Form 8570-1); and
- Copy of final printed label (one copy).

The enclosed label (note we have enclosed a label for 27.5 and 137.5 fl.oz. package sizes) is based upon the EPA stamped approved label dated November 7, 2013 and represents the alternate brand name "Fuse™ Termiticide/Insecticide". The label will be affixed to the bottle as a front panel and back panel booklet label. Please note that at this time the product has not been released for shipment.

If you have any questions or need additional information, please contact me at 281-892-2532.

Sincerely,

Elizabeth Tannehill
Regulatory Affairs

Enclosures

cc: Jennifer Urbanski, EPA

Please read instructions on reverse before completing form. Form Approved. OMB No. 2070-0060. Approval expires 05-31-98

EPA United States **Environmental Protection Agency** Washington, DC 20460

☐ Registration ☐ Amendment ☒ Other

OPP Identifier Number

Application for Pesticide - Section I

1. Company/Product Number: 53883-328
2. EPA Product Manager: Venus Eagle
3. Proposed Classification: ☒ None ☐ Restricted
4. Company/Product (Name): CSI Imidacloprid + Fipronil SC
5. PM# 1
5. Name and Address of Applicant *(Include ZIP Code)*: Control Solutions, Inc. 5903 Genoa Red Bluff Rd Pasadena, TX 77507
☐ *Check if this is a new address*
6. **Expedited Review**. In accordance with FIFRA Section 3(c)(3)(b)(I), my product is similar or identical in composition and labeling to:
EPA Reg. No. _____
Product Name _____

Section II

☐ Amendment - Explain below.
☐ Resubmission in response to Agency letter dated XX-XX-XX
☐ Notification - Explain below.
☒ Final printed labels in response to Agency letter dated 11/7/2013
☐ "Me Too" Application
☐ Other - Explain below.

Explanation: Use additional page(s) if necessary. (For section I and Section II.)
Submission of a final printed label to EPA for the new end-use product CSI Imidacloprid + Fipronil SC.

Section III

1. Material This Product Will Be Packaged In:

Child-Resistant Packaging: ☐ Yes* ☒ No
Certification must be submitted

Unit Packaging: ☐ Yes ☒ No
If "Yes" Unit Packaging wgt. | No. per Container

Water Soluble Packaging: ☐ Yes ☒ No
If "Yes" Package wgt. | No. per Container

2. Type of Container: ☐ Metal ☒ Plastic ☐ Glass ☐ Paper ☐ Other (Specify) Plastic Bag

3. Location of Net Contents Information: ☒ Label ☐ Container
4. Size(s) Retail Container: 27.5 oz and 2.15 gallons
5. Location of Label Directions: ☒ On Container ☐ On Labeling accompanying product

6. Manner in Which Label is Affixed to Product: ☐ Lithograph ☒ Other Adhesive on container ☐ Paper glued ☐ Stenciled

Section IV

1. Contact Point *(Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)*

Name	Title	Telephone No. (Include Area Code)
Elizabeth Tannehill	Regulatory Affairs	281-892-2532

Certification

I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.

6. Date Application Received **(Stamped)**

2. Signature BY: _____
3. Title: Regulatory Affairs
4. Typed Name: Elizabeth Tannehill
5. Date: 2/28/2014

FUSE™

Termiticide/Insecticide

- Contains imidacloprid
- Contains fipronil
- Offers structural termite protection

(Always read and follow label directions and specific state restrictions that may apply.)

Manufactured by:

CSI CONTROL SOLUTIONS incorporated

A Makhteshim-Agan Company

5903 Genoa-Red Bluff
Pasadena, TX 77507-1041

For sale to, use and storage only by individuals/firms licensed or registered by the state to apply termiticide and/or general pest control products.

EPA Reg. No.: 53883-328
EPA Est. No.: 53883-TX-002
37429-GA-001[BT]
37429-GA-002[BO]

0 72693 00015 5

Active Ingredients:

[1]Imidacloprid:	21.4%
[2]Fipronil:	6.6%
Other Ingredients:	72.0%
TOTAL:	100.0%

[1]Imidacloprid: 1-1 (6-Chloro-3-pyridinyl)methyl]-N-nitro-2-imidazolidinimine

[2]Fipronil: (5-amino-1-(2,6-dichloro-4-(trifluoromethyl) phenyl)-4-((1,R,S)-(trifluoromethyl)sulfinyl)-1-H-pyrazole-3-carbonitrile)

Contains 2.0 pounds of imidacloprid per gallon and 0.6 pounds of fipronil per gallon.

Shake well before using.

KEEP OUT OF REACH OF CHILDREN

CAUTION/PRECAUCIÓN

See attached label for additional precautionary information an complete Directions for use.

Net Contents: 27.5 fl. oz.

FUSE™

TERMITICIDE/INSECTICIDE

It is a violation of federal law to use this product in a manner inconsistent with its labeling.

- **DO NOT** use this product for termite or other pest control indoors, except for label-specified applications for termite control and foam applications to wall voids for control of other listed pests.
- **DO NOT** use on animal trophies or animal skins.
- **DO NOT** use on/in commercial beehives.

See inside booklet for additional **Restrictions, First Aid, Precautionary Statements, Directions For Use, Conditions of Sale and Warranty,** and state-specific use sites and/or restrictions.

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***Fipronil**	6.6%
OTHER INGREDIENTS:	72.0%
TOTAL	100.0%

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EPA Reg. No. 53883-328

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37429-GA-001[ST]
37429-GA-002[SO]

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CAUTION/PRECAUCIÓN

PRECAUCIÓN AL USUARIO: Si usted no puede leer o entender inglés, no use este producto hasta que la etiqueta le haya sido explicada ampliamente. (**TO THE USER:** If you cannot read or understand English, do not use this product until the label has been fully explained to you.)

(See attached label for additional precautionary information and complete Directions for Use.)

Control Solutions, Inc.
5903 Genoa-Red Bluff
Pasadena, TX 77507-1041

NET CONTENTS: **27.5 FL. OZ.**

FUSE™

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Control Solutions, Inc.
5903 Genoa-Red Bluff
Pasadena, TX 77507-1041

NET CONTENTS: **27.5 FL. OZ.**

FIRST AID Have the product container or label with you when calling a poison control center or doctor, or going for treatment.	
If swallowed:	• Call a Poison Control Center or doctor immediately for treatment advice. • Have person sip a glass of water if able to swallow. • Do not induce vomiting unless told to do so by a poison control center or doctor. • Do not give anything by mouth to an unconscious person.
If on skin or clothing:	• Take off contaminated clothing. • Rinse skin immediately with plenty of water for 15-20 minutes. • Call a poison control center or doctor for treatment advice.
If inhaled:	• Move person to fresh air. • If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably by mouth-to-mouth, if possible. • Call a poison control center or doctor for treatment advice.
If in eyes:	• Hold eye open and rinse slowly and gently with water for 15-20 minutes. Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye. • Call a poison control center or doctor for treatment advice.
Note to Physician: There is no specific antidote. All treatment should be based on observed signs and symptoms of distress in the patient. Overexposure to materials other than this product may have occurred. In severe cases of overexposure by oral ingestion, lethargy, muscle tremors, and in extreme cases, possibly convulsions may occur.	
Have the product container or label with you when calling a poison control center or doctor, or going for treatment. You may also contact SafetyCall® (866) 897-8050 for emergency medical treatment information.	

PRECAUTIONARY STATEMENTS
HAZARDS TO HUMANS AND DOMESTIC ANIMALS

CAUTION: Harmful if swallowed, absorbed through skin or inhaled. Do not get in eyes, on skin or on clothing. Do not breathe spray mist. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, or using tobacco. Remove and wash contaminated clothing before reuse.

FIRST AID	
Have the product container or label with you when calling a poison control center or doctor, or going for treatment.	
If swallowed:	• Call a Poison Control Center or doctor immediately for treatment advice. • Have person sip a glass of water if able to swallow. • Do not induce vomiting unless told to do so by a poison control center or doctor. • Do not give anything by mouth to an unconscious person.
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Personal Protective Equipment (PPE):
Applicators and other handlers (mixers and loaders) must wear:

- Long-sleeved shirt and long pants.
- Chemical-resistant gloves made of any waterproof material such as barrier laminate, butyl rubber, nitrile rubber, neoprene rubber, natural rubber, polyvinylchloride (PVC) or viton.
- Shoes plus socks.

In addition: All pesticide handlers must wear a dust/mist filtering respirator (MSHA/NIOSH approval number prefix TC-21C), or a NIOSH approved respirator with any N, R, P or HE filter, when working in a non-ventilated space, including but not limited to crawl-spaces and basements. All pesticide handlers must wear protective eyewear (goggles, a face shield, or safety glasses with front, brow, and temple protection) when working in a non-ventilated space, including but not limited to crawl-spaces and basements or when applying termiticide by rodding or sub-slab injection.

Follow manufacturer's instructions for cleaning/maintaining PPE. If no such instructions for washables, use detergent and hot water. Keep and wash PPE separately from other laundry.

USER SAFETY RECOMMENDATIONS

User must:

- Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, using tobacco, or using the toilet.
- Remove and wash contaminated clothing before reuse. Then wash body thoroughly with soap and water and put on clean clothing.
- Remove PPE immediately after handling this product. Wash outside of gloves before removing.

ENVIRONMENTAL HAZARDS

This product is toxic to birds and fish and highly toxic to aquatic invertebrates. Do not apply directly to water, to areas where surface water is present or to intertidal areas below the mean high water mark. Runoff from treated areas may be hazardous to aquatic organisms in neighboring areas. Do not contaminate water when disposing of equipment washwaters.

This product is highly toxic to bees exposed to direct treatment or residues on blooming crops/plants or weeds. Do not apply this product or allow it to drift to blooming crops/plants or weeds if bees are foraging in the treatment area.

This chemical demonstrates the properties and characteristics associated with chemicals detected in groundwater. The use of this chemical in areas where soils are permeable, particularly where the water table is shallow, may result in groundwater contamination.

Apply this product only as specified on this label. Extreme care must be taken to avoid runoff. Apply only to soil or other fill substrate that will accept the solution at the specified rate. Do not treat soil that is water-saturated or frozen or in any conditions where run-off or movement from the treatment area (site) is likely to occur.

DIRECTIONS FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with its labeling.

Read entire label before using this product.

Do not apply this product in a way that will contact workers or other persons, either directly or through drift. Only protected handlers may be in the area during application. For any requirements specific to your State or Tribe, consult the agency responsible for pesticide regulation.

APPLICATION AS A TERMITICIDE

FUSE™ may be used in and along the outside perimeter of structures and building construction to prevent and control termite infestations.

USE INSTRUCTIONS

For subterranean termite control, specific treatment recommendations may differ due to regulations, treatment procedures, soil types, construction practices and other factors. The purpose of chemical soil treatment for termite control is to establish a continuous treated zone (horizontal and/or vertical) between the wood and other cellulose material in the structure and the termite colonies in the soil. Follow all federal, state, and local regulations and treatment standards for protection of a structure from termites. The establishment of an aerial or above ground colony may require additional treatments to control the termites, as well as landscape modifications, and/or structural repairs to deny termites of a moisture source. Use a 0.067% to 0.13% dilution based on current recommendations. For a typical control situation, a 0.067% dilution is used. A 0.13% dilution may be used when a severe or persistent infestation exists.

When treating adjacent to an existing structure, the applicator must check the area to be treated, and immediately adjacent areas of the structure, for visible and accessible cracks and holes to prevent any leaks or significant exposures to persons occupying the structure. People present or residing in the structure during application must be advised to remove their pets and themselves

from the structure if they see any signs of leakage. After application, the applicator is required to check for leaks. All leaks resulting in the deposition of termiticide in locations other than those prescribed on this label must be cleaned up prior to leaving the application site. Do not allow people or pets to contact contaminated areas or to reoccupy contaminated areas of the structure until the clean-up is completed.

Structures that contain wells or cisterns within the foundation of the structure can only be treated using the treated backfill method described in the treatment around wells and cisterns section of this label. Consult state and local specifications for recommended distances of wells from treated area, or if such regulations do not exist, refer to Federal Housing Administration Specifications (H.U.D.) for guidance.

MIXING: Refer to **MIXING TABLE** for correct amount of FUSE™ to be used.
Follow this procedure for mixing the termiticide dilution:

1. Fill tank to 1/3 full.
2. If using large sprayer, start pump to begin bypass agitation and place end of treating tool in tank to allow circulation through hose.
3. Add appropriate amount of FUSE™.
4. Add remaining amount of water.
5. Let pump run and allow recirculation through the hose for 2 to 3 minutes or until the product is completely dispersed.

MIXING TABLE FOR FUSE™		
DILUTION CONCENTRATE	**GALLONS WATER**	**AMOUNT OF FUSE™**
0.067%	100	27.5 fl. oz.
	50	13.8 fl. oz.
	25	6.9 fl. oz.
	1	0.3 fl. oz.
0.13%	100	55 fl. oz.
	50	27.5 fl. oz.
	25	13.8 fl. oz.
	1	0.6 fl. oz.

MIXING TABLE FOR FUSE™		
DILUTION CONCENTRATE	**GALLONS WATER**	**AMOUNT OF FUSE™**
0.067%	10	2.8 fl. oz.
	5	1.4 fl. oz.
	2	0.6 fl. oz.
	1	0.3 fl. oz.
0.13%	10	5.6 fl. oz.
	5	2.8 fl. oz.
	2	1.2 fl. oz.
	1	0.6 fl. oz.

IN-LINE INJECTION: Use the table below to mix the appropriate amount of FUSE™ for the desired injection volume of finished dilution.

MIXING TABLE - INJECTOR	
INJECTOR VOLUME	**CONCENTRATION**
0.3 fl. oz./gal	0.067%
0.6 fl. oz./gal	0.13%

CONVERSION KEY: 128 fl. oz. = 1 gal; 16 fl. oz. = 1 pint; 8 pints = 1 gal; 1 fl. oz. = 29.5 mL

APPLICATION VOLUME

To provide maximum control and protection against termite infestation, apply the specified volume of the finished water solution and active ingredients as set forth in the directions for use section of this label. If soil will not accept the labeled application volume, the volume may be reduced provided there is a corresponding increase in concentration so that the amount of active ingredients applied to the soil remains the same.

Note: Large reductions of application volume reduce the ability to obtain a continuous barrier. Variance is allowed when volume and concentration are consistent with label directed rates and a continuous barrier can still be achieved.

PRE-CONSTRUCTION TREATMENT

Do not apply at a lower dosage and/or concentration than specified on this label for application prior to installation of the finished grade.

Prior to each application, applicators must notify the general contractor, construction superintendent, or similar responsible party, of the intended termiticide application and intended sites of application and instruct the responsible person to notify construction workers and other individuals to leave the area to be treated during application and until the termiticide is absorbed into the soil.

CONCRETE SLAB-ON-GROUND OR BASEMENTS: Apply an overall treatment to the entire surface of soil or other substrate to be covered by the slab including areas to be under carports, porches, basement floor and entrance platforms. Apply at the rate of 1 gallon of solution to accurately and uniformly cover 10 square feet. If fill under slab is gravel or other coarse aggregate, apply at the rate of 1.5 gallons or sufficient volume of solution, to accurately and uniformly cover 10 square feet. In addition, apply 4 gallons of solution (see **APPLICATION VOLUME**) per 10 linear feet to provide a uniform treated zone in soil at critical areas such as along the inside of foundation walls, and around plumbing, bath traps, utility services, and other features that will penetrate the slab.

After completion of grading, make an application by trenching or trenching and rodding around the slab or foundation perimeter. Rodding may be done from the bottom of a shallow trench. When rodding, rod holes must be spaced in a manner that will allow for a continuous treated zone, not to exceed 12 inches, to be deposited along the treated area. Rod holes must not extend below the footing. Apply 4 gallons of solution (see **APPLICATION VOLUME**) per 10 linear feet, per foot of depth to provide a uniform treated zone. When trenching, the trench along the outside foundation must be about 6 inches in width and 6 inches in depth. Use a low pressure spray (not to exceed 25 PSI at the treatment tool when the valve is open) to treat soil which will be placed in the trench after rodding. Mix the spray solution with soil as it is being placed in the trench. When treating voids in hollow masonry units, use 2 gallons of solution per 10 linear feet of wall. Apply solution so it will reach the footing by injecting into the lower areas of the wall, just above the floor or footing.

When treating foundations deeper than 4 feet, apply the termiticide as the backfill is being replaced or if the construction contractor fails to notify the applicator to permit this, treat the foundation to a minimum depth of 4 feet after the backfill has been installed. The applicator must trench and rod into the trench or trench along the foundation walls and around pillars and other foundation elements, at the rate prescribed from grade to a minimum depth of 4 feet. When the top of the footing is exposed, the applicator must treat the soil adjacent to the footing to a depth not to exceed the bottom of the footing. Do not treat structures below the footing.

Rodding in trench followed by flooding of trench and treatment of backfill may provide a better opportunity to achieve a continuous treated zone than using soil rodding alone to establish a vertical treated zone.

CRAWL SPACES: Application must be made by trenching or trenching and rodding downward along the inside and outside of foundation walls, around piers, interior supports in contact with the soil, plumbing, and utility services. Apply 4 gallons of solution (see **APPLICATION VOLUME**) per 10 linear feet, per foot of depth to provide a uniform treated zone. Rodding may be done from the bottom of a shallow trench to top of the footing or a minimum of 4 feet. When rodding, rod holes must be spaced in a manner that will allow for a continuous treated zone to be deposited along the treated area. Rod holes must not extend below the footing. When trenching, the trench must be about 6 inches wide and 6 inches deep. Use a low pressure spray to treat soil which will be placed in the trench, mixing the spray solution with soil as it is being placed in the trench.

HOLLOW BLOCK FOUNDATIONS OR VOIDS: Hollow block foundations or voids in masonry resting on the footing may be treated to provide a continuous treated zone in the voids at the footing. Apply 2 gallons of solution per 10 linear feet to the lower part of the void so that it reaches the top of the footing or soil.

Treatment of voids in block or rubble foundation walls must be closely examined. Applicators must inspect areas of possible runoff as a precaution against application leakage in the treated areas. Some areas may not be treatable or may require mechanical alteration prior to treatment.

All leaks resulting in the deposition of termiticide in locations other than those prescribed on this label must be cleaned up prior to leaving the application site (refer to **PRECAUTIONARY STATEMENTS**). Do not allow people or pets to contact or to reoccupy the contaminated areas of the structure until the clean-up is completed.

POST-CONSTRUCTION TREATMENT

CONCRETE SLAB-ON-GROUND: To apply a treatment under the slab, including attached porches, carports, entrance platforms, garages and similar slab structures, it may be necessary to drill through the slab or exterior foundation. Drill holes must be spaced in a manner that will allow for application of a continuous treated zone. Treat all existing cracks and old construction or expansion joints. Also, treat around bath traps, plumbing and utility services which penetrate the slab. Apply 4 gallons of solution (see **APPLICATION VOLUME**) per 10 linear feet per foot of depth to provide a uniform treated zone. DO NOT MAKE TREATMENT UNTIL LOCATION OF HEAT OR AIR CONDITIONING DUCTS AND VENTS ARE KNOWN AND IDENTIFIED. USE EXTREME CAUTION TO AVOID CONTAMINATION OF DUCTS AND VENTS. Plug and fill all

drilled holes in commonly occupied areas with a suitable sealant. Plugs must be of non-cellulose material or covered by an impervious, non-cellulose material.

Apply by trenching or trenching and rodding around the outside of the foundation wall. Apply 4 gallons of solution (see **APPLICATION VOLUME**) per 10 linear feet per foot of depth to provide a uniform treated zone. When trenching, the trench along the outside foundation must be about 6 inches wide and 6 inches deep. Use a low pressure spray to treat soil as it is being placed in the trench.

Rodding can be done from the bottom of a shallow trench. When rodding, rod holes must be spaced in a manner that will allow for a continuous treated zone, not to exceed 12 inches, to be deposited along the treated area. Rod hole depth must not extend below the footing.

BATH TRAPS: Exposed soil or soil covered with tar or a similar type sealant beneath and around plumbing and/or drain pipe entry areas must be treated with 3 gallons of solution per square foot. An access door or inspection vent must be cut and installed, if not already present. After inspection and removal of any wood or cellulose debris, the soil can be treated by rodding or drenching the soil.

CRAWL SPACES: When there is insufficient clearance between floor joists and ground surfaces to allow applicator access, excavate, if possible, and treat according to crawl spaces (refer to **PRE-CONSTRUCTION TREATMENT**). If unable to excavate, crawl space soil and wood treatment may be used to prevent surface access by termites. Apply 1 gallon of solution (see **APPLICATION VOLUME**) per 10 square feet to provide a uniform treated zone. Use a very coarse spray at a pressure not exceeding 25 PSI at the treatment tool when the valve is open.

Where a crawl space cannot be reached with the application wand, use extension wands or other suitable equipment to apply a coarse spray on the soil, wood and structural members contacting the soil at the above rates. Do not apply to inaccessible crawl space areas using pressures greater than 25 PSI at the treatment tool when the valve is open.

Treatment may also be made by drilling through the foundation wall or through the floor above and treating the soil perimeter at a rate of 1 gallon of solution per 10 square feet. Drill spacing must be at intervals not to exceed 16 inches. Many states have smaller intervals so check state regulations which may apply.

To prevent subterranean termites from constructing mudtubes between soil and crawl space wood members above, an overall soil treatment of this product may be applied. Remove all cellulose debris before application. Apply 1 gallon of solution (see **APPLICATION VOLUME**) per 10 square feet to provide a uniform treated zone.

SHALLOW FOUNDATIONS: For shallow foundations, one foot or less in depth, dig a narrow trench approximately 6 inches wide and deep along the outside and inside of the foundation walls, being careful not to dig below the bottom of the footings. For foundations with exposed footings, dig a trench alongside the footing taking care not to undermine the footing. Apply 4 gallons of solution (see **APPLICATION VOLUME**) per 10 linear feet to the top of footer to provide a uniform treated zone. The dilution must be applied to the trench and mixed with the soil as it is placed in the trench.

BASEMENTS - OUTSIDE PERIMETER: Along the outside of the exterior walls, an application must be made by trenching or rodding within the trench. Rodding depth must be to the top of the footer, or to a minimum of 4 feet or according to state or local regulations, when rodding through a trench, dig a narrow trench about 6 inches wide and 6 inches deep. Apply 4 gallons of solution (see **APPLICATION VOLUME**) per 10 linear feet, per foot of depth to provide a uniform treated zone by rodding through the trench. Use a low pressure spray to treat soil which will be placed into the trench after rodding. Mix spray solution with the soil as it is being placed in the trench.

BASEMENTS - INSIDE PERIMETER: If necessary, treat by drilling along the perimeter of the interior walls. Applications also may be necessary around sewer pipes, floor drains, conduits, expansion joints or any cracks or holes in the basement floor. Apply 4 gallons of solution (see **APPLICATION VOLUME**) per 10 linear feet to provide a uniform treated zone.

Drill holes must be spaced in a manner that will allow for application of a continuous treated zone. Plug and fill all drill holes in commonly occupied areas of the building with a suitable sealant. Plugs must be of non-cellulose material or covered by an impervious, non-cellulose material.

HOLLOW BLOCK FOUNDATION OR VOIDS: Hollow block foundations or voids in masonry resting on the footing may be treated to provide a continuous treated zone in the voids at the footing. Apply 2 gallons of solution per 10 linear feet to the lower part of the void so that it reaches the top of the footing or soil, drill spacing must be at intervals not to exceed 16 inches. Many states have smaller intervals so check state regulations which may apply.

Treatment of voids in block or rubble foundation walls must be closely examined. Applicators must inspect areas of possible runoff as a precaution against application leakage in the treated areas. Some areas may not be treatable or may require mechanical alteration prior to treatment.

All leaks resulting in the deposition of termiticide in locations other than those prescribed on this label must be cleaned up prior to leaving the application site (refer to **PRECAUTIONARY STATEMENTS**). Do not allow people or pets to contact or to reoccupy the contaminated areas of the structure until the cleanup is completed.

PLENUMS: For plenum-type structures which use a sealed underfloor space to circulate heated and/or cooled air throughout the structure, apply the dilution at the rate of 4 gallons of solution (see **APPLICATION VOLUME**) per 10 linear feet, per foot of depth of soil to provide a uniform treated zone adjacent to both sides of foundation walls, supporting piers, plumbing and conduits. Treat soil by trenching to a depth of 6 inches or trenching and rodding (where conditions permit) or to the top of the footing. When conditions will not permit trenching or rodding, a surface application adjacent to interior foundation walls may be made, but the treated strip shall not exceed a width of 18 inches, horizontally, from the foundation walls, piers or pipes. The surface application will be made at a rate of 1.5 gallons of solution per 10 square feet as a very coarse spray under low pressure (not to exceed 25 PSI when measured at the treating tool when valve is on).

When treating plenums, turn off the air circulation system of the structure until application has been completed and all termiticide has been absorbed by the soil.

TREATMENT AROUND WELLS OR CISTERNS: Do not contaminate wells or cisterns.

Structures With Wells/Cisterns Inside Foundations: Structures that contain wells or cisterns within the foundation of a structure can only be treated using the following techniques:

1. Do not apply within 5 feet of any well or cistern by rodding and/or trenching or by the backfill method. Treat soil between 5 and 10 feet from the well or cistern by the backfill method only. Treatment of soil adjacent to water pipes within 3 feet of grade must only be done by the backfill method.
   a) Trench and remove soil to be treated onto heavy plastic sheeting or similar material or into a wheelbarrow.
   b) Treat the soil at the rate of 4 gallons of solution per 10 linear feet per foot of depth of the trench, or 1 gallon per 1.0 cubic feet of soil. Mix thoroughly into the soil taking care to contain the liquid and prevent runoff or spillage.
   c) After the treated soil has absorbed the solution, replace the soil into the trench.
2. Treat infested and/or damaged wood in place using an injection technique such as described in the **CONTROL OF WOOD INFESTING PESTS** section of this label.

Structures With Adjacent Wells/Cisterns and/or Other Water Bodies: Applicators must inspect all structures with nearby water sources such as wells, cisterns, surface ponds, streams, and other bodies of water and evaluate, at a minimum, the treatment recommendations listed below prior to making an application.

1. Prior to treatment, if feasible, expose the water pipes coming from the well to the structure, if the pipes enter the structure within 3 feet of grade.
2. Prior to treatment applicators are advised to take precautions to limit the risk of applying the termiticide into subsurface drains that could empty into any bodies of water. These precautions include evaluating whether application of the termiticide to the top of the footer may result in contamination of the subsurface drain. Factors such as depth to the drain system and soil type and degree of compaction must be taken into account in determining the depth of treatment.
3. When appropriate (i.e., on the water side of the structure), the treated backfill technique (described above) can also be used to minimize off-site movement of termiticide.

EXTERIOR PERIMETER/INTERIOR SPOT TREATMENT*

*Not approved for use in Louisiana.

INFORMATION

Exterior Perimeter/Interior Spot Treatment is an optional method of termite treatment only for use in post-construction applications, after the final grade is established. Structural protection when using the Exterior Perimeter/Interior Spot Treatment is accomplished by: 1) establishing a continuous treated zone around the entire exterior foundation wall of the building; and 2) spot-treating infested areas on the building interior. Soil adjacent to the exterior foundation wall must be treated in the same manner as conventional (full) application. It is required that a complete and continuous treated zone be achieved around the entire exterior perimeter, including under any attached slabs such garages, porches, patios, driveways and pavement adjoining the foundation. Interior spot treatments must then be made to any indoor areas where termite activity is present. Optional interior spot treatments may also be made to high risk areas including, but not limited to plumbing and utility penetrations (including bath traps), along settlement cracks and expansion joints, and dirt-filled porches.

Exterior Perimeter/Interior Spot Treatment can be used as a preventative treatment (before structural infestation occurs) or as a curative treatment (after structural infestation occurs) in existing structures. Preventative treatment does not include pre-construction applications made to protect construction. It is required that a thorough structural inspection be completed before treatment, to locate all areas of active infestation. Spot treatment of all known sites of termite activity is required with this optional labeling. If no termite activity is observed inside the structure, interior spot treatments are not required.

EXTERIOR PERIMETER TREATMENT

It is required that all structures, regardless of the type of construction, be protected by establishing a vertical treated zone along the outer perimeter of the foundation wall. Consult the OUTER FOUNDATION WALLS section of this label (see below) for detailed directions of this treatment procedure.

1. **OUTER FOUNDATION WALLS:** Application must be made by trenching, or where appropriate (see below) by trenching, or trenching and rodding from the bottom of the trench, around the outside of the foundation walls. When trenching, excavate a trench along the outside foundation that is about 6 inches wide and 6 inches deep. Apply 4 gallons of solution (see APPLICATION VOLUME) per 10 linear feet, per foot of depth to provide a uniform vertical treated zone.
   - For shallow foundations, one foot or less of depth, dig a narrow trench that does not exceed 6 inches wide and 6 inches deep along the outside of the foundation walls, being careful not to dig below the bottom of the footings. For foundations with exposed footings, dig a trench alongside the footing taking care not to undermine the footing.
   - For basements and other foundations deeper that one foot, the application must be made by trenching and rodding from bottom of a shallow trench. When rodding, rod holes must be spaced in a manner that will allow for a continuous treated zone, not to exceed 12 inches, to be deposited along the treated area. Rod holes must not extend below the footing. Rodding depth should be to the top of the footer, or to a maximum depth of 4 feet, or according to state or local regulations.
   - For all applications, apply the solution into the trench and mix with the excavated soil as it is replaced into the trench. Use a low-pressure spray to treat soil that will be replaced into the trench after rodding. Mix spray solution with the soil as it is being replaced in the trench.

Where direct access to soil on the outer foundation wall is impossible due to attached porches, entrance platforms, garages and similar slab structures, consult the CONCRETE SLAB-ON-GROUND section of this label for directions on treatment of soil beneath these structures. However, where obstruction (e.g., concrete walkways) adjacent but not attached to foundation, or where soil type and/or conditions prevent trenching the exterior perimeter treatment may be performed at the obstructed location by rodding alone. When rodding, rod holes must be spaced in a manner that will allow for a continuous treated zone, not to exceed 12 inches, to be deposited along the treated area.

2. CONCRETE SLAB-ON-GROUND: To treat soil beneath a slab, including attached porches, carports, entrance platforms, garages and similar slab structures abutting the foundation wall, it is necessary to drill through the slab. If an infestation is associated with an expansion joint, crack, utility penetration, or similar access point in the slab, treat by drilling and injecting through the slab. Drill holes on both sides of the infested site. Apply 4 gallons of solution (see APPLICATION VOLUME) per 10 linear feet. DO NOT MAKE TREATMENT UNTIL LOCATION OF HEAT OR AIR CONDITIONING DUCT AND VENTS ARE KNOWN AND IDENTIFIED. USE EXTREME CAUTION TO NOT CONTAMINATE DUCTS AND VENTS. Plug and fill all drilled holes in commonly occupied areas with suitable sealant. Plugs must be of non-cellulose material.

3. INACCESSIBLE CRAWL SPACES: If termite activity is found along the perimeter wall or on a pier within an inaccessible crawl space, areas with termite activity must be treated. Apply 4 gallons of solution (see APPLICATION VOLUME) per 10 linear feet to create a vertical treated zone, which must extend a minimum of 3 feet on both sides of the infested site. Optional directions for horizontal rodding: Treatment may also be made by drilling through the foundation wall (or through the floor above) to treat the soil along the perimeter wall at a rate of 4 gallons of solution (see APPLICATION VOLUME) per 10 linear feet. Drill spacing must be at intervals not to exceed 16 inches. Many states have shorter intervals so check state regulations which may apply. If termite activity is neither along the perimeter wall nor on a pier within the inaccessible crawl space, to prevent subterranean termites from constructing mud tubes between soil in the crawl space and wooden elements in the structure, an overall soil treatment of this product may be applied. Remove all cellulose debris before application. Apply 1 gallon of solution (see APPLICATION VOLUME) per 10 square feet to provide a uniform treated zone.

4. ACCESSIBLE CRAWL SPACES: If termite activity is found within a accessible crawl space, the area(s) where termite activity exist must be treated by trenching, or trenching and rodding from the bottom of the trench, along the interior foundation walls, around piers, interior supports in contact with the soil, plumbing, or utility services. Apply 4 gallons of solution (see APPLICATION VOLUME) per 10 linear feet, per foot of depth, to create a vertical treated zone, which must extend a minimum of 3 feet on both sides of the infested site. Rodding may be done from the bottom of a shallow trench to the top of the footing or to a minimum depth of 4 feet. When rodding, rod holes must be spaced in a manner that will allow for a continuous treated zone, not to exceed 12 inches, to be deposited along the treated area. Rod holes must not extend below the footing. When trenching, dig a narrow trench about 6 inches wide and 6 inches deep. Use a low-pressure spray to treat soil which will be placed in the trench, mixing the spray solution with soil as it is being placed in the trench.

RESTRICTION: Do not allow people or pets to contact or to reoccupy any contaminated areas of the structure until the clean-up is completed.

INTERIOR SPOT TREATMENT

Targeted applications must be made to all known infested sites inside the structure. One or more of the following application methods must be used to make interior spot treatments:

- Sub-slab injections made through the slab at or near areas where termites are known to be penetrating the slab to reach wood in the structure and/or at or near sites of active infestations. Apply 4 gallons per 10 linear feet per foot of depth. Sub-slab injections must extend to a minimum of 3 feet on either side of every known infested site at expansion joints or cracks in slabs.
- Void treatments using injection of sprays, mist or foams into above ground structural voids, termite carton nests, and other infested locations.
- Wood treatments using injection techniques and/or surface applications, to treat active infestations in structural timbers.

To maximize dispersion of treatment solution in soil and in above ground locations, the use of foam and directional dispersion tips is encouraged for all interior spot treatments. Consult section(s) of this label appropriate to the element of construction, FOAM APPLICATIONS or CONTROL OF WOOD INFESTING PESTS for detailed directions on any of these treatment procedures.

1. INTERIOR SLABS: When termite activity is located within an interior wall or structural member, the soil beneath the slab and the wall void at this site of activity must be treated. The source of infestation at an expansion joint, crack, through a utility penetration, or similar access point in the slab, must be treated by drilling and injecting through the slab. Drill holes in the slab must be spaced in a manner that will allow for application of a continuous treated zone, which must extend a minimum of 3 feet on either side of the infested site. Apply 4 gallons of solution (see APPLICATION VOLUME) per 10 linear feet. To maximize dispersion of treatment solution in soil, the use of foam and directional dispersion tips is encouraged. To treat the wall void, consult section(s) of this label appropriate to the element of construction, FOAM APPLICATIONS or CONTROL OF WOOD INFESTING PESTS for detailed directions on any of these treatment procedures. DO NOT MAKE TREATMENT UNTIL LOCATION OF HEAT OR AIR CONDITIONING DUCTS AND VENTS ARE KNOWN AND IDENTIFIED. USE EXTREME CAUTION TO NOT CONTAMINATE DUCTS AND VENTS. Plug and fill all drilled holes in commonly occupied areas with suitable sealant. Plugs must be of non-cellulose material or covered by an impervious, non-cellulose material.

2. HOLLOW BLOCK FOUNDATION OR MASONRY VOIDS: Termite activity located within hollow-block foundations or masonry voids must be treated. Spot treatment at the site(s) of termite activity must extend a minimum of 3 feet on both sides. Treat masonry voids by applying 2 gallons of solution per 10 linear feet to the lower part of the void so that it reaches the top of the footing or soil. Drill spacing in masonry voids must be at intervals not to exceed 16 inches; states may have shorter intervals so check state regulations which may apply. To maximize dispersion of treatment solution in voids, the use of foam and directional dispersion tips is encouraged. To treat structural voids above sites of termite activity in masonry, consult section(s) of this label appropriate to the element of construction, FOAM APPLICATIONS or CONTROL OF WOOD INFESTING PESTS for detailed directions on any of these treatment procedures. Treatment of voids in block or rubble foundation walls must be closely examined. Applicators must inspect areas of possible runoff as a precaution against application leakage in the treated areas. Some areas may not be treatable or may require mechanical alteration prior to treatment. All leaks resulting in the deposition of termiticide in locations other than those prescribed on this label must be cleaned up prior to leaving the application site (refer to Precautionary Statements).

Restriction: Do not allow people or pets to contact or to reoccupy the contaminated area of the structure until the clean-up is completed.

3. BATH TRAPS: If termite activity is observed within 2 feet of the bath trap, then exposed soil or soil covered with tar or similar type of sealant around plumbing and/or drain pipe entry areas must be treated. Tar or sealant may have to be removed to allow for adequate soil treatment. An access door or inspection portal should be installed if one is not present. After inspection and removal of any wood or cellulose debris, the soil can be treated by rodding or drenching the soil at the volume of no less than 3 gallons of solution per square foot.

4. SHOWER OR FLOOR DRAINS: If termite activity is observed within 2 feet of a shower of floor drain in the slab, the soil beneath the drain must be treated. Drill through the slab adjacent to the drain and use sub-slab injection to apply solution to the soil. Multiple access points may be drilled adjacent to the drain. Treat soil at a volume of 1 gallon of solution per square foot.

FOAM APPLICATIONS

Construction practices, soil subsidence and other factors may create situations in which a continuous treated zone cannot be achieved using conventional treatment alone. In situations where necessary, conventional application methods can be supplemented through use of foam generating equipment, or similar devices, to provide a continuous treated zone.

Foam application may be made alone or in combination with conventional application methods, provided that the labeled amount of active ingredient per unit area is used.

Foam Application Use Directions: Mix appropriate concentration of FUSE™ in water and add the manufacturer's recommended quantity of foam agent to the FUSE™ solution (see table for foaming recommendations). Apply a sufficient volume of FUSE™ foam alone or in combination with liquid solution to provide a continuous treated zone at the labeled rate for specific application sites.

NOTE: Add the manufacturer's recommended quantity of foam agent to the FUSE™ solution.

MIXING TABLE - FUSE™ FOAM

FUSE™ (mL)	GALLONS OF WATER	FOAM EXPANSION RATIO	FINISHED FOAM (0.067% ai)
160	1	20:1	20 gal
80	1	10:1	10 gal
40	1	5:1	5 gal

MIXING TABLE - FUSE™ FOAM

FUSE™ (fl oz)	GALLONS OF WATER	FOAM EXPANSION RATIO	FINISHED FOAM (0.067% ai)
6.9	1	25:1	25 gal
	2.5	10:1	
	5	5:1	
13.8	1	50:1	50 gal
	2.5	20:1	
	5	10:1	

Depending on the circumstances, foam applications may be used alone or in combination with liquid solution applications. Applications may be made behind veneers, piers, chimney bases, into rubble foundations, into block voids or structural voids, wall voids, under slabs, stoops, porches, or to the soil in crawlspaces, and other similar voids.

Foam and liquid applications must be consistent with volume and active ingredient instructions in order to ensure proper application has been made. The volume and amount of active ingredient are essential to an effective treatment. At least 75% of the gallons of FUSE™ must

be applied as a typical liquid treatment. The remaining 25% or fewer gallons is delivered to appropriate locations using a foam application.

NOTE: When foam is used solely to kill subterranean termites in above ground locations (such as feeding galleries in wooden framing, or in voids with framed walls), and whenever the target pest is other than subterranean termites (drywood termites, beetles, ants, etc.) dilute solutions of FUSE™ may be expanded by foaming without concentrating the FUSE™ solution as previously described for soil applications. Add the manufacturers' recommended volume of foaming agent to produce foam of the desired expansion ratio. Use application tips and methods suitable to the site and pest.

CONTROL OF WOOD INFESTING PESTS

For control of above ground termites and carpenter ants in localized areas, apply a 0.067% to 0.13% solution of sufficient volume of FUSE™ foam to voids and galleries in damaged wood, and in spaces between wooden structural members and between the sill plate and foundation where wood is vulnerable. Applications may be made to inaccessible areas by drilling, and then injecting the suspension or foam with a suitable directional injector into the damaged wood or wall voids. Termite carton nests in building voids may be injected with a 0.067% to 0.13% suspension or foam. Multiple injection points to varying depths may be necessary. It is desirable to physically remove carton nest material from building voids when such nests are found. Application to attics, crawl spaces, unfinished basements or man-made voids may be made with a coarse fan spray of 0.067% to 0.13% solution or foam to control exposed worker and winged reproductive forms of termites or carpenter ants. This type of application is intended to be a supplemental treatment for control of above ground subterranean termites and carpenter ants.

It is recommended to remove or prune away any shrubbery, bushes, and tree branches touching the structure. Vegetation touching the structure may offer a route of entry for ants into the structure. This may allow ants to inhabit the structure without coming in contact with the treatment. If nests are found, direct treatment of FUSE™ can be made to theses nests.

Use a 0.067% to 0.13% solution to control existing infestations of or to prevent infestation by termites or carpenter ants in trees, utility poles, fencing and decking materials, landscape timbers and similar non-structural wood-to-soil contacts. If possible, locate the interior infested cavity and inject a 0.067% to 0.13% solution or sufficient volume of FUSE™ foam using an appropriate treatment tool with a splash back guard. These non-structural wood-to-soil contacts may also be treated by applying a solution to the soil as a spot application or continuous treated zone applied as a drench or by rodding around the base of the point(s) of soil contact(s). Rod holes must be placed approximately 3 inches away from the soil contact

point(s) and spaced no more than 12 inches along the perimeter of the soil contact(s). For small poles or posts (< 6 inches in diameter), apply 1 gallon per foot of depth. For larger constructions, apply 4 gallons per 10 linear feet per foot of depth. Retreat as needed to maintain protection.

Termite carton nests in trees may be injected with a 0.067% to 0.13% solution or sufficient volume of foam using a pointed injection fool. Multiple injection points to varying depths may be necessary. Removal of carton material from trees is desirable but may not be necessary when foam application is used. In some instances, a perimeter application of a 0.067% to 0.13% solution applied to soil around the root flare of the tree may be necessary to prevent reinfestation by termites in the soil. For small trees (6 inches in diameter), apply 1 gallon of solution. For larger trees, apply 4 gallons per 10 linear feet (measured as the circumference at the root flare).

For protection of firewood or other wood products stored in contact with soil from carpenter ants and termites, treat soil prior to stacking with a 0.067% to 0.13% solution at 1 gallon per 10 square feet to prevent infestation. Curative application to the soil around firewood or other wood products stored in contact with soil may be made as described for non-structural wood-to-soil contacts (above).

Drywood termites and wood-infesting beetles or borers (such as, but not limited to, powder post beetles, anobiid or deathwatch beetles, false powder post beetles, old house borers, wharf borers, or ambrosia or bark beetles). **Galleries and structure voids** can be treated with sprays, mists, or foams of a 0.067% to 0.13% FUSE™ solution. Locate galleries by using visual signs (frass or pellets, blistered wood, emergence or clean out holes); the presence of live insects, mechanical sounding techniques, or listening devices (e.g., stethoscopes, acoustic emission detectors). Penetrate the gallery system by drilling holes to receive the injector tip or treatment tool. Distribute drill holes to adequately cover the gallery system. [NOTE: Avoid drilling where electrical wiring, plumbing lines, etc. are located.] Apply FUSE™ solutions as a low pressure (about 20 psi) spray or by misting or where appropriate, by foaming. It is not necessary to treat to the point where runoff is detected from adjacent holes.] NOTE: Do not apply where electrical shock hazards exist.] Drill holes must be sealed after treatment. Also, **wood surfaces** can be sprayed or misted with a 0.067% to 0.13% solution or, where appropriate, use a sufficient volume of foam. For inaccessible surfaces, drill and treat the interior of structural voids. Surfaces treated may include exposed wooden surfaces in crawlspaces, basements, or attics, wooden exterior surfaces such as decks, fencing, or siding, structural voids, channels in damaged wood, in spaces between wooden members of a structure, and junctions between wood and foundations. Apply by brushing or as a coarse, low pressure (about 20 psi) spray to the wood surface; apply sufficient volume to cover the surface to the point of wetness, but avoid applying

to the point of runoff. When spraying overhead in non-living areas, cover surfaces below the treated area with plastic sheeting or similar material. Avoid contact with treated surfaces until spray deposits have dried. Retreat as needed to maintain protection.

Localized treatment for carpenter bees: Apply a 0.067% to 0.13% solution as a spray or mist, or sufficient volume of foam, directly into gallery entrance holes. Following treatment, entrance holes may be plugged with small pieces of steel wool or similar material.

RETREATMENT

Retreatment for subterranean termites can only be performed if there is clear evidence of reinfestation or disruption of the treated zone due to construction, excavation, or landscaping and/or evidence of the breakdown of the treated zone in the soil. The vulnerable or reinfested areas may be retreated in accordance with application techniques described in this product's labeling. The timing and type of these retreatments will vary, depending on factors such as termite pressure, soil types, soil conditions and other factors which may reduce the effectiveness of the treated zone. Retreatment may be made as either a spot or complete treatment.

When a structure is not known to be reinfested and the treated zone is not disturbed, but where the structure was last treated five or more years ago, retreatment may be performed if, in the judgment of the applicator, it is necessary to ensure adequate protection of the structure. In determining the timing of any retreatment, the applicator must consider efficacy and/or degradation data and/or site-specific conditions and previous experience that indicate a vulnerability of the structure to termite attack.

Annual retreatment of the structure is prohibited unless there is clear evidence that reinfestation or treated zone disruption has occurred.

When another registered termite control product/system is used as the primary treatment for prevention or control of subterranean termites and is applied to all label-specified areas, FUSE™ may be applied as a spot application in a secondary treatment to critical areas of the structure including plumbing and utility entry sites, bath traps, expansion joints, foundation cracks. The outside foundation wall, and areas of known or suspected activity at either a pre-construction or post-construction timing. These secondary treatments must be made applied in amounts and concentration in accordance with label directions relevant to the treatment area(s) to receive the secondary treatment.

DIRECTIONS FOR USE TO CONTROL LISTED PESTS ON OUTSIDE SURFACES AND ALONG FOUNDATION PERIMETER OF LISTED STRUCTURES

Listed structures are residential, institutional, commercial and industrial buildings and utility enclosures.

USE RESTRICTIONS:

- Do not allow this product to contact plants in bloom if bees are foraging the treatment area.
- Only applicators wearing the personal protective equipment required by this product label may be in the area during application.
- Do not treat within a distance of 1 foot out from the dripline of edible plants.
- Do not contaminate public or private water supplies.
- Do not apply to wasp or hornet nests if they are not attached to or within the structure.
- Do not make treatments during times of precipitation.
- Do not allow residents, children, other people or pets into the treatment area until sprays have dried. After treatment, the applicator is required to check for leaks resulting in the deposition of treatment dilution in locations other than those prescribed in this label. When found, this material must be cleaned prior to leaving the application site. Do not allow people or pets to contact contaminated areas or to reoccupy contaminated areas of the structure until clean-up is completed.
- Do not spray air conditioning units or intake vents.
- Do not use indoors except for application into wall voids or as directed otherwise in this label.
- Do not exceed the maximum total applications per year noted in the use directions.
- Do not apply to playground equipment and pet quarters.
- Do not apply to applications to runoff or drip from treated surfaces.
- Do not apply to boat houses, including their piers or pilings.
- Do not apply within 5 feet of wells or cisterns.
- Do not apply to French drains or other permeable drainage.
- Doors and windows adjacent to application site must be closed during surface application.
- Do not apply within 15 feet of bodies of fresh water; lakes, reservoirs, rivers, permanent streams, marshes, natural ponds and commercial fish ponds. A 15- foot buffer of uniform groundcover must exist between application zone and bodies of fresh water (uniform ground cover is defined as land which supports vegetation of greater than 2 inches in height throughout).
- Do not apply within 60 feet of estuarine bodies of water. Estuarine water bodies are brackish, tidal water bodies such as bays, mouths of rivers, salt marshes and lagoons.

Use FUSE™ to kill and to provide residual control of the following pests:
Ants (acrobat, Argentine, big-headed, Caribbean crazy, carpenter, crazy, odorous, pavement, and thief)

Use FUSE™ to kill the following pests:
Asian lady beetles, darkling beetles
Cellar spiders
Box-elder bugs, pill bugs
Cluster flies
European earwigs
House crickets
Millipedes
Silverfish

MIXING INSTRUCTIONS
For perimeter pest treatments mix a 0.067% to 0.13% spray dilution of FUSE™ by filling the treatment tank 1/4 to 1/3 full with water, then add the 0.3 to 0.6 fluid ounces FUSE™ per finished gallon. The filling hose must be equipped with an anti-backflow device or the water flow must include an air gap to protect against back siphoning. Add the remaining water to the tank while agitating.

APPLICATIONS TO OUTSIDE SURFACES OF LISTED STRUCTURES AND INTO WALL VOIDS
Apply 0.067% to 0.13% of finished FUSE™ dilution as a low-pressure spray to the exterior of the structure where listed pests enter, trail around the structure or where they crawl and hide. Treat using a low-pressure coarse banded surface spray up to 18 inches in width around doors, windows, vents, pipes, foundation cracks, drilled holes or around any exterior opening where listed pests could enter the structure. Make sure to treat the joint where exterior siding (wood, vinyl, aluminum or other similar materials) meets the cement, brick or block foundation. Treat anywhere electrical, cable or telephone wires enter the house. This treatment must be made as a general surface spray, crack and crevice spray, or a wall void application. FUSE™ may be applied as a foam treatment into wall voids to kill and / or control the above listed pests. Refer to the **Foam Application** section of this label for specific foam mixing and application instructions.

Application to Perimeter of Listed Structures
Apply 0.067% to 0.13% of finished FUSE™ dilution as a low pressure, coarse, general surface spray along the foundation exterior perimeter. The applications may be made in a narrow band of 1 foot wide out by 1 foot wide up from where the ground meets the foundation or in a wide band of 2 feet wide out by 2 feet wide up from where the ground meets the foundation. Refer to the **Application Table for Perimeter Treatments** for the maximum number of applications permitted each year based on concentration and band width.

Application Table for Perimeter Treatments

Dilution Concentrate	Narrow Band 1 ft up by 1 ft out	Wide Band 2 ft up by 2 ft out
0.067%	8 perimeter applications/year	4 perimeter applications/year
0.13%	4 perimeter applications/year	2 perimeter applications/year

Do not exceed the specified number of applications per year.

Apply 2 quarts of 0.067% to 0.13% finished spray per 160 linear feet (approximately 1.5 gallons finished spray per 1000 square feet). Nests that are found on the ground within 2 feet of the foundation may be treated.

If treating with a finished dilution volume greater than 1 gallon of finished dilution, mix the appropriate amount of FUSE™ SC in the desired number of gallons of water to be applied to cover 1000 square feet. For Example: If the desired finished volume of dilution is five gallons per 1000 square feet at the high rate (0.13%), mix 0.6 fl. oz. FUSE™ for every five gallons of water in the tank.

Vegetation touching the structure may offer a route for the entry for ants into the structure without coming into contact with the treatment; therefore, it is recommended to remove or prune away any shrubbery, bushes, and tree branches touching the structure.

STORAGE AND DISPOSAL

Do not contaminate water, food or feed by storage or disposal.

Storage

Store unused product in original container only, out of reach of children and animals.

Pesticide Disposal

Pesticide wastes are acutely hazardous. Improper disposal of excess pesticide is a violation of Federal law. If these wastes cannot be disposed of by use according to label instructions, contact your State Pesticide or Environmental Control Agency, or the Hazardous Waste representative at the nearest EPA Regional Office for guidance.

Container Disposal

Nonrefillable Container: Do not reuse or refill this container. Triple rinse or pressure rinse container (or equivalent) promptly after emptying; then offer for recycling, if available, or reconditioning, if appropriate, or puncture and dispose of in a sanitary landfill, or by incineration, or by other procedures approved by state and local authorities.

STORAGE AND DISPOSAL (continued)

Triple rinse containers small enough to shake (capacity ≤ 5 gallons) as follows: Empty the remaining contents into application equipment or a mix tank and drain for 10 seconds after the flow begins to drip. Fill the container 1/4 full with water and recap. Shake for 10 seconds. Pour rinsate into application equipment or a mix tank, or store rinsate for later use or disposal. Drain for 10 seconds after the flow begins to drip. Repeat this procedure two more times.

Pressure rinse as follows: Empty the remaining contents into application equipment or mix tank. Hold container upside down over application equipment or mix tank, or collect rinsate for later use or disposal. Insert pressure rinsing nozzle in the side of the container and rinse at about 40 PSI for at least 30 seconds. Drain for 10 seconds after the flow begins to drip.

In case of minor spills or leaks, soak up with sand, earth or other suitable material and dispose of as pesticide waste.

Control Solutions, Inc. warrants that this product conforms to the chemical description on the label thereof and is reasonably fit for purposes stated on such label only when used in accordance with directions under normal use conditions. It is impossible to eliminate all risks inherently associated with use of this product. Crop injury, ineffectiveness, or other unintended consequences may result because of such factors as weather conditions, presence of other materials, or the manner of use or application, all of which are beyond the control of Control Solutions, Inc. To the extent consistent with applicable law, Control Solutions, Inc. shall in no event be liable for consequential, special, or indirect damages resulting from the use or handling of this product. All such risks shall be assumed by the Buyer. In addition to the foregoing, no purchaser of this product (other than an end user) shall be entitled to any reimbursement for any loss suffered as a result of any suspension or cancellation of the registration for this product by the U.S. Environmental Protection Agency. Except, as expressly provided herein and to the extent consistent with applicable law, Control Solutions, Inc. makes no warranties, guarantees, or representations of any kind, either expressed or implied, or by usage of trade, statutory or otherwise, with regard to the product sold, including, but not limited to merchantability, fitness for a particular purpose, use or eligibility of the product for any particular trade usage. The exclusive remedy of any buyer or user of this product for any and all losses, injuries, or damage resulting from or in any way arising from the use, handling, or application of this product, whether in contract, warranty, tort, negligence, strict liability, or otherwise, shall be damages not exceeding the purchase price paid for this product or, at Control Solutions, Inc. election, the replacement of this product.

Control Solutions, Inc.
5903 Genoa-Red Bluff
Pasadena, TX 77507

FUSE™

TERMITICIDE/INSECTICIDE

It is a violation of federal law to use this product in a manner inconsistent with its labeling.

- **DO NOT** use this product for termite or other pest control indoors, except for label-specified applications for termite control and foam applications to wall voids for control of other listed pests.
- **DO NOT** use on animal trophies or animal skins.
- **DO NOT** use on/in commercial beehives.

See inside booklet for additional **Restrictions, First Aid, Precautionary Statements, Directions For Use, Conditions of Sale and Warranty,** and state-specific use sites and/or restrictions.

For sale to, use and storage only by individuals/firms licensed or registered by the state to apply termiticide and/or general pest control products.

ACTIVE INGREDIENTS:

Imidacloprid: 1-1(6-Chloro-3-pyridinyl)methyl]-N-nitro-2-imidazolidinimine	21.4%
***Fipronil**	6.6%
OTHER INGREDIENTS:	72.0%
TOTAL	100.0%

(5-amino-1-(2,6-dichloro-4-(trifluoromethyl)phenyl)-4-((1,R,S)-(trifluoromethyl)sulfinyl)-1-H-pyrazole-3-carbonitrile)

Contains 2.0 pounds of imidacloprid per gallon and 0.6 pounds of fipronil per gallon.

Shake well before using.

EPA Reg. No. 53883-328

EPA Est. No. 53883-TX-002
37429-GA-001[ST]
37429-GA-002[BO]

KEEP OUT OF REACH OF CHILDREN

CAUTION/PRECAUCIÓN

PRECAUCIÓN AL USUARIO: Si usted no puede leer o entender inglés, no use este producto hasta que la etiqueta le haya sido explicada ampliamente. (**TO THE USER:** If you cannot read or understand English, do not use this product until the label has been fully explained to you.)

(See attached label for additional precautionary information and complete Directions for Use.)

Control Solutions, Inc.
5903 Genoa-Red Bluff
Pasadena, TX 77507-1041

NET CONTENTS: **27.5 FL. OZ.**

FUSE™

Termiticide/Insecticide

- Contains imidacloprid
- Contains fipronil
- Offers structural termite protection

(Always read and follow label directions and specific state restrictions that may apply.)

For sale to, use and storage only by individuals/ firms licensed or registered by the state to apply termiticide and/or general pest control products.

Manufactured by:

CSI CONTROL SOLUTIONS incorporated

A Makhteshim-Agan Company

5903 Genoa-Red Bluff, Pasadena, TX 77507-1041

Active Ingredients:

[1]Imidacloprid:	21.4%
[2]Fipronil:	6.6%
Other Ingredients:	72.0%
TOTAL:	100.0%

[1]Imidacloprid: 1-1 (6-Chloro-3-pyridinyl)methyl]-N-nitro-2-imidazolidinimine

[2]Fipronil: (5-amino-1-(2,6-dichloro-4-(trifluoromethyl)phenyl)-4-((1,R,S)-(trifluoromethyl) sulfinyl)-1-H-pyrazole-3-carbonitrile)

Contains 2.0 pounds of imidacloprid per gallon and 0.6 pounds of fipronil per gallon.

Shake well before using.

KEEP OUT OF REACH OF CHILDREN

CAUTION/PRECAUCIÓN

See attached label for additional precautionary information an complete Directions for use.

EPA Registration No.: 53883-328
EPA Establishment No.: 53883-TX-002[BT]
37429-GA-001 37429-GA-002[BO]

Net Contents: 137.5 fl. oz.

0 72693 00029 2

FUSE™

TERMITICIDE/INSECTICIDE

It is a violation of federal law to use this product in a manner inconsistent with its labeling.

- **DO NOT** use this product for termite or other pest control indoors, except for label-specified applications for termite control and foam applications to wall voids for control of other listed pests.
- **DO NOT** use on animal trophies or animal skins.
- **DO NOT** use on/in commercial beehives.

See inside booklet for additional **Restrictions, First Aid, Precautionary Statements, Directions For Use, Conditions of Sale and Warranty,** and state-specific use sites and/or restrictions.

For sale to, use and storage only by individuals/firms licensed or registered by the state to apply termiticide and/or general pest control products.

ACTIVE INGREDIENTS:	
Imidacloprid: 1-1(6-Chloro-3-pyridinyl)methyl]-N-nitro-2-imidazolidinimine	21.4%
***Fipronil**	6.6%
OTHER INGREDIENTS:	72.0%
TOTAL	100.0%

(5-amino-1-(2,6-dichloro-4-(trifluoromethyl)phenyl)-4-((1,R,S)-(trifluoromethyl)sulfinyl)-1-H-pyrazole-3-carbonitrile)

Contains 2.0 pounds of imidacloprid per gallon and 0.6 pounds of fipronil per gallon.

Shake well before using.

EPA Reg. No. 53883-328

EPA Est. No. 53883-TX-002
37429-GA-001[ST]
37429-GA-002[SO]

KEEP OUT OF REACH OF CHILDREN

CAUTION/PRECAUCIÓN

PRECAUCIÓN AL USUARIO: Si usted no puede leer o entender inglés, no use este producto hasta que la etiqueta le haya sido explicada ampliamente. (**TO THE USER:** If you cannot read or understand English, do not use this product until the label has been fully explained to you.)

(See attached label for additional precautionary information and complete Directions for Use.)

Control Solutions, Inc.
5903 Genoa-Red Bluff
Pasadena, TX 77507-1041

NET CONTENTS: **137.5 FL. OZ.**

FIRST AID	
Have the product container or label with you when calling a poison control center or doctor, or going for treatment.	
If swallowed:	• Call a Poison Control Center or doctor immediately for treatment advice. • Have person sip a glass of water if able to swallow. • Do not induce vomiting unless told to do so by a poison control center or doctor. • Do not give anything by mouth to an unconscious person.
If on skin or clothing:	• Take off contaminated clothing. • Rinse skin immediately with plenty of water for 15-20 minutes. • Call a poison control center or doctor for treatment advice.
If inhaled:	• Move person to fresh air. • If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably by mouth-to-mouth, if possible. • Call a poison control center or doctor for treatment advice.
If in eyes:	• Hold eye open and rinse slowly and gently with water for 15-20 minutes. Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye. • Call a poison control center or doctor for treatment advice.
Note to Physician: There is no specific antidote. All treatment should be based on observed signs and symptoms of distress in the patient. Overexposure to materials other than this product may have occurred. In severe cases of overexposure by oral ingestion, lethargy, muscle tremors, and in extreme cases, possibly convulsions may occur.	
Have the product container or label with you when calling a poison control center or doctor, or going for treatment. You may also contact SafetyCall® (866) 897-8050 for emergency medical treatment information.	

PRECAUTIONARY STATEMENTS
HAZARDS TO HUMANS AND DOMESTIC ANIMALS

CAUTION: Harmful if swallowed, absorbed through skin or inhaled. Do not get in eyes, on skin or on clothing. Do not breathe spray mist. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, or using tobacco. Remove and wash contaminated clothing before reuse.

Personal Protective Equipment (PPE):
Applicators and other handlers (mixers and loaders) must wear:

- Long-sleeved shirt and long pants.
- Chemical-resistant gloves made of any waterproof material such as barrier laminate, butyl rubber, nitrile rubber, neoprene rubber, natural rubber, polyvinylchloride (PVC) or viton.
- Shoes plus socks.

In addition: All pesticide handlers must wear a dust/mist filtering respirator (MSHA/NIOSH approval number prefix TC-21C), or a NIOSH approved respirator with any N, R, P or HE filter, when working in a non-ventilated space, including but not limited to crawl-spaces and basements. All pesticide handlers must wear protective eyewear (goggles, a face shield, or safety glasses with front, brow, and temple protection) when working in a non-ventilated space, including but not limited to crawl-spaces and basements or when applying termiticide by rodding or sub-slab injection.

Follow manufacturer's instructions for cleaning/maintaining PPE. If no such instructions for washables, use detergent and hot water. Keep and wash PPE separately from other laundry.

USER SAFETY RECOMMENDATIONS

User must:

- Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, using tobacco, or using the toilet.
- Remove and wash contaminated clothing before reuse. Then wash body thoroughly with soap and water and put on clean clothing.
- Remove PPE immediately after handling this product. Wash outside of gloves before removing.

ENVIRONMENTAL HAZARDS

This product is toxic to birds and fish and highly toxic to aquatic invertebrates. Do not apply directly to water, to areas where surface water is present or to intertidal areas below the mean high water mark. Runoff from treated areas may be hazardous to aquatic organisms in neighboring areas. Do not contaminate water when disposing of equipment washwaters.

This product is highly toxic to bees exposed to direct treatment or residues on blooming crops/plants or weeds. Do not apply this product or allow it to drift to blooming crops/plants or weeds if bees are foraging in the treatment area.

This chemical demonstrates the properties and characteristics associated with chemicals detected in groundwater. The use of this chemical in areas where soils are permeable, particularly where the water table is shallow, may result in groundwater contamination.

Apply this product only as specified on this label. Extreme care must be taken to avoid runoff. Apply only to soil or other fill substrate that will accept the solution at the specified rate. Do not treat soil that is water-saturated or frozen or in any conditions where run-off or movement from the treatment area (site) is likely to occur.

DIRECTIONS FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with its labeling.

Read entire label before using this product.

Do not apply this product in a way that will contact workers or other persons, either directly or through drift. Only protected handlers may be in the area during application. For any requirements specific to your State or Tribe, consult the agency responsible for pesticide regulation.

APPLICATION AS A TERMITICIDE

FUSE™ may be used in and along the outside perimeter of structures and building construction to prevent and control termite infestations.

USE INSTRUCTIONS

For subterranean termite control, specific treatment recommendations may differ due to regulations, treatment procedures, soil types, construction practices and other factors. The purpose of chemical soil treatment for termite control is to establish a continuous treated zone (horizontal and/or vertical) between the wood and other cellulose material in the structure and the termite colonies in the soil. Follow all federal, state, and local regulations and treatment standards for protection of a structure from termites. The establishment of an aerial or above ground colony may require additional treatments to control the termites, as well as landscape modifications, and/or structural repairs to deny termites of a moisture source. Use a 0.067% to 0.13% dilution based on current recommendations. For a typical control situation, a 0.067% dilution is used. A 0.13% dilution may be used when a severe or persistent infestation exists.

When treating adjacent to an existing structure, the applicator must check the area to be treated, and immediately adjacent areas of the structure, for visible and accessible cracks and holes to prevent any leaks or significant exposures to persons occupying the structure. People present or residing in the structure during application must be advised to remove their pets and themselves from the structure if they see any signs of leakage. After application, the applicator is required to check for leaks. All leaks resulting in the deposition of termiticide in locations other than those prescribed on this label must be cleaned up prior to leaving the application site. Do not allow people or pets to contact contaminated areas or to reoccupy contaminated areas of the structure until the clean-up is completed.

Structures that contain wells or cisterns within the foundation of the structure can only be treated using the treated backfill method described in the treatment around wells and cisterns section of this label. Consult state and local specifications for recommended distances of wells from treated area, or if such regulations do not exist, refer to Federal Housing Administration Specifications (H.U.D.) for guidance.

MIXING: Refer to **MIXING TABLE** for correct amount of FUSE™ to be used.
Follow this procedure for mixing the termiticide dilution:

1. Fill tank to 1/3 full.
2. If using large sprayer, start pump to begin bypass agitation and place end of treating tool in tank to allow circulation through hose.
3. Add appropriate amount of FUSE™.
4. Add remaining amount of water.
5. Let pump run and allow recirculation through the hose for 2 to 3 minutes or until the product is completely dispersed.

MIXING TABLE FOR FUSE™		
DILUTION CONCENTRATE	**GALLONS WATER**	**AMOUNT OF FUSE™**
0.067%	100	27.5 fl. oz.
	50	13.8 fl. oz.
	25	6.9 fl. oz.
	1	0.3 fl. oz.
0.13%	100	55 fl. oz.
	50	27.5 fl. oz.
	25	13.8 fl. oz.
	1	0.6 fl. oz.

MIXING TABLE FOR FUSE™		
DILUTION CONCENTRATE	**GALLONS WATER**	**AMOUNT OF FUSE™**
0.067%	10	2.8 fl. oz.
	5	1.4 fl. oz.
	2	0.6 fl. oz.
	1	0.3 fl. oz.
0.13%	10	5.6 fl. oz.
	5	2.8 fl. oz.
	2	1.2 fl. oz.
	1	0.6 fl. oz.

IN-LINE INJECTION: Use the table below to mix the appropriate amount of FUSE™ for the desired injection volume of finished dilution.

MIXING TABLE - INJECTOR	
INJECTOR VOLUME	**CONCENTRATION**
0.3 fl. oz./gal	0.067%
0.6 fl. oz./gal	0.13%

CONVERSION KEY: 128 fl. oz. = 1 gal; 16 fl. oz. = 1 pint; 8 pints = 1 gal; 1 fl. oz. = 29.5 mL

APPLICATION VOLUME

To provide maximum control and protection against termite infestation, apply the specified volume of the finished water solution and active ingredients as set forth in the directions for use section of this label. If soil will not accept the labeled application volume, the volume may be reduced provided there is a corresponding increase in concentration so that the amount of active ingredients applied to the soil remains the same.

Note: Large reductions of application volume reduce the ability to obtain a continuous barrier. Variance is allowed when volume and concentration are consistent with label directed rates and a continuous barrier can still be achieved.

PRE-CONSTRUCTION TREATMENT

Do not apply at a lower dosage and/or concentration than specified on this label for application prior to installation of the finished grade.

Prior to each application, applicators must notify the general contractor, construction superintendent, or similar responsible party, of the intended termiticide application and intended sites of application and instruct the responsible person to notify construction workers and other individuals to leave the area to be treated during application and until the termiticide is absorbed into the soil.

CONCRETE SLAB-ON-GROUND OR BASEMENTS: Apply an overall treatment to the entire surface of soil or other substrate to be covered by the slab including areas to be under carports, porches, basement floor and entrance platforms. Apply at the rate of 1 gallon of solution to accurately and uniformly cover 10 square feet. If fill under slab is gravel or other coarse aggregate, apply at the rate of 1.5 gallons or sufficient volume of solution, to accurately and uniformly cover 10 square feet. In addition, apply 4 gallons of solution (see **APPLICATION VOLUME**) per 10 linear feet to provide a uniform treated zone in soil at critical areas such as along the inside of foundation walls, and around plumbing, bath traps, utility services, and other features that will penetrate the slab.

After completion of grading, make an application by trenching or trenching and rodding around the slab or foundation perimeter. Rodding may be done from the bottom of a shallow trench. When rodding, rod holes must be spaced in a manner that will allow for a continuous treated zone, not to exceed 12 inches, to be deposited along the treated area. Rod holes must not extend below the footing. Apply 4 gallons of solution (see **APPLICATION VOLUME**) per 10 linear feet, per foot of depth to provide a uniform treated zone. When trenching, the trench along the outside foundation must be about 6 inches in width and 6 inches in depth. Use a low pressure spray (not to exceed 25 PSI at the treatment tool when the valve is open) to treat soil which will be placed in the trench after rodding. Mix the spray solution with soil as it is being placed in the trench. When treating voids in hollow masonry units, use 2 gallons of solution per 10 linear feet of wall. Apply solution so it will reach the footing by injecting into the lower areas of the wall, just above the floor or footing.

When treating foundations deeper than 4 feet, apply the termiticide as the backfill is being replaced or if the construction contractor fails to notify the applicator to permit this, treat the foundation to a minimum depth of 4 feet after the backfill has been installed. The applicator must trench and rod into the trench or trench along the foundation walls and around pillars and other foundation elements, at the rate prescribed from grade to a minimum depth of 4 feet. When the top of the footing is exposed, the applicator must treat the soil adjacent to the footing to a depth not to exceed the bottom of the footing. Do not treat structures below the footing.

Rodding in trench followed by flooding of trench and treatment of backfill may provide a better opportunity to achieve a continuous treated zone than using soil rodding alone to establish a vertical treated zone.

CRAWL SPACES: Application must be made by trenching or trenching and rodding downward along the inside and outside of foundation walls, around piers, interior supports in contact with the soil, plumbing, and utility services. Apply 4 gallons of solution (see **APPLICATION VOLUME**) per 10 linear feet, per foot of depth to provide a uniform treated zone. Rodding may be done from the bottom of a shallow trench to top of the footing or a minimum of 4 feet. When rodding, rod holes must be spaced in a manner that will allow for a continuous treated zone to be deposited along the treated area. Rod holes must not extend below the footing. When trenching, the trench must be about 6 inches wide and 6 inches deep. Use a low pressure spray to treat soil which will be placed in the trench, mixing the spray solution with soil as it is being placed in the trench.

HOLLOW BLOCK FOUNDATIONS OR VOIDS: Hollow block foundations or voids in masonry resting on the footing may be treated to provide a continuous treated zone in the voids at the footing. Apply 2 gallons of solution per 10 linear feet to the lower part of the void so that it reaches the top of the footing or soil.

Treatment of voids in block or rubble foundation walls must be closely examined. Applicators must inspect areas of possible runoff as a precaution against application leakage in the treated areas. Some areas may not be treatable or may require mechanical alteration prior to treatment.

All leaks resulting in the deposition of termiticide in locations other than those prescribed on this label must be cleaned up prior to leaving the application site (refer to **PRECAUTIONARY STATEMENTS**). Do not allow people or pets to contact or to reoccupy the contaminated areas of the structure until the clean-up is completed.

POST-CONSTRUCTION TREATMENT

CONCRETE SLAB-ON-GROUND: To apply a treatment under the slab, including attached porches, carports, entrance platforms, garages and similar slab structures, it may be necessary to drill through the slab or exterior foundation. Drill holes must be spaced in a manner that will allow for application of a continuous treated zone. Treat all existing cracks and old construction or expansion joints. Also, treat around bath traps, plumbing and utility services which penetrate the slab. Apply 4 gallons of solution (see **APPLICATION VOLUME**) per 10 linear feet per foot of depth to provide a uniform treated zone. DO NOT MAKE TREATMENT UNTIL LOCATION OF HEAT OR AIR CONDITIONING DUCTS AND VENTS ARE KNOWN AND IDENTIFIED. USE EXTREME CAUTION TO AVOID CONTAMINATION OF DUCTS AND VENTS. Plug and fill all drilled holes in commonly occupied areas with a suitable sealant. Plugs must be of non-cellulose material or covered by an impervious, non-cellulose material.

Apply by trenching or trenching and rodding around the outside of the foundation wall. Apply 4 gallons of solution (see **APPLICATION VOLUME**) per 10 linear feet per foot of depth to provide a uniform treated zone. When trenching, the trench along the outside foundation must be about 6 inches wide and 6 inches deep. Use a low pressure spray to treat soil as it is being placed in the trench.

Rodding can be done from the bottom of a shallow trench. When rodding, rod holes must be spaced in a manner that will allow for a continuous treated zone, not to exceed 12 inches, to be deposited along the treated area. Rod hole depth must not extend below the footing.

BATH TRAPS: Exposed soil or soil covered with tar or a similar type sealant beneath and around plumbing and/or drain pipe entry areas must be treated with 3 gallons of solution per square foot. An access door or inspection vent must be cut and installed, if not already present. After inspection and removal of any wood or cellulose debris, the soil can be treated by rodding or drenching the soil.

CRAWL SPACES: When there is insufficient clearance between floor joists and ground surfaces to allow applicator access, excavate, if possible, and treat according to crawl spaces (refer to **PRE-CONSTRUCTION TREATMENT**). If unable to excavate, crawl space soil and wood treatment may be used to prevent surface access by termites. Apply 1 gallon of solution (see **APPLICATION VOLUME**) per 10 square feet to provide a uniform treated zone. Use a very coarse spray at a pressure not exceeding 25 PSI at the treatment tool when the valve is open.

Where a crawl space cannot be reached with the application wand, use extension wands or other suitable equipment to apply a coarse spray on the soil, wood and structural members contacting the soil at the above rates. Do not apply to inaccessible crawl space areas using pressures greater than 25 PSI at the treatment tool when the valve is open.

Treatment may also be made by drilling through the foundation wall or through the floor above and treating the soil perimeter at a rate of 1 gallon of solution per 10 square feet. Drill spacing must be at intervals not to exceed 16 inches. Many states have smaller intervals so check state regulations which may apply.

To prevent subterranean termites from constructing mudtubes between soil and crawl space wood members above, an overall soil treatment of this product may be applied. Remove all cellulose debris before application. Apply 1 gallon of solution (see **APPLICATION VOLUME**) per 10 square feet to provide a uniform treated zone.

SHALLOW FOUNDATIONS: For shallow foundations, one foot or less in depth, dig a narrow trench approximately 6 inches wide and deep along the outside and inside of the foundation walls, being careful not to dig below the bottom of the footings. For foundations with exposed footings, dig a trench alongside the footing taking care not to undermine the footing. Apply 4 gallons of solution (see **APPLICATION VOLUME**) per 10 linear feet to the top of footer to provide a uniform treated zone. The dilution must be applied to the trench and mixed with the soil as it is placed in the trench.

BASEMENTS - OUTSIDE PERIMETER: Along the outside of the exterior walls, an application must be made by trenching or rodding within the trench. Rodding depth must be to the top of the footer, or to a minimum of 4 feet or according to state or local regulations, when rodding through a trench, dig a narrow trench about 6 inches wide and 6 inches deep. Apply 4 gallons of solution (see **APPLICATION VOLUME**) per 10 linear feet, per foot of depth to provide a uniform treated zone by rodding through the trench. Use a low pressure spray to treat soil which will be placed into the trench after rodding. Mix spray solution with the soil as it is being placed in the trench.

BASEMENTS - INSIDE PERIMETER: If necessary, treat by drilling along the perimeter of the interior walls. Applications also may be necessary around sewer pipes, floor drains, conduits, expansion joints or any cracks or holes in the basement floor. Apply 4 gallons of solution (see **APPLICATION VOLUME**) per 10 linear feet to provide a uniform treated zone.

Drill holes must be spaced in a manner that will allow for application of a continuous treated zone. Plug and fill all drill holes in commonly occupied areas of the building with a suitable sealant. Plugs must be of non-cellulose material or covered by an impervious, non-cellulose material.

HOLLOW BLOCK FOUNDATION OR VOIDS: Hollow block foundations or voids in masonry resting on the footing may be treated to provide a continuous treated zone in the voids at the footing. Apply 2 gallons of solution per 10 linear feet to the lower part of the void so that it reaches the top of the footing or soil, drill spacing must be at intervals not to exceed 16 inches. Many states have smaller intervals so check state regulations which may apply.

Treatment of voids in block or rubble foundation walls must be closely examined. Applicators must inspect areas of possible runoff as a precaution against application leakage in the treated areas. Some areas may not be treatable or may require mechanical alteration prior to treatment.

All leaks resulting in the deposition of termiticide in locations other than those prescribed on this label must be cleaned up prior to leaving the application site (refer to **PRECAUTIONARY STATEMENTS**). Do not allow people or pets to contact or to reoccupy the contaminated areas of the structure until the cleanup is completed.

PLENUMS: For plenum-type structures which use a sealed underfloor space to circulate heated and/or cooled air throughout the structure, apply the dilution at the rate of 4 gallons of solution (see **APPLICATION VOLUME**) per 10 linear feet, per foot of depth of soil to provide a uniform treated zone adjacent to both sides of foundation walls, supporting piers, plumbing and conduits. Treat soil by trenching to a depth of 6 inches or trenching and rodding (where conditions permit) or to the top of the footing. When conditions will not permit trenching or rodding, a surface application adjacent to interior foundation walls may be made, but the treated strip shall not exceed a width of 18 inches, horizontally, from the foundation walls, piers or pipes. The surface application will be made at a rate of 1.5 gallons of solution per 10 square feet as a very coarse spray under low pressure (not to exceed 25 PSI when measured at the treating tool when valve is on).

When treating plenums, turn off the air circulation system of the structure until application has been completed and all termiticide has been absorbed by the soil.

TREATMENT AROUND WELLS OR CISTERNS: Do not contaminate wells or cisterns.

Structures With Wells/Cisterns Inside Foundations: Structures that contain wells or cisterns within the foundation of a structure can only be treated using the following techniques:

1. Do not apply within 5 feet of any well or cistern by rodding and/or trenching or by the backfill method. Treat soil between 5 and 10 feet from the well or cistern by the backfill method only. Treatment of soil adjacent to water pipes within 3 feet of grade must only be done by the backfill method.
   a) Trench and remove soil to be treated onto heavy plastic sheeting or similar material or into a wheelbarrow.
   b) Treat the soil at the rate of 4 gallons of solution per 10 linear feet per foot of depth of the trench, or 1 gallon per 1.0 cubic feet of soil. Mix thoroughly into the soil taking care to contain the liquid and prevent runoff or spillage.
   c) After the treated soil has absorbed the solution, replace the soil into the trench.
2. Treat infested and/or damaged wood in place using an injection technique such as described in the **CONTROL OF WOOD INFESTING PESTS** section of this label.

Structures With Adjacent Wells/Cisterns and/or Other Water Bodies: Applicators must inspect all structures with nearby water sources such as wells, cisterns, surface ponds, streams, and other bodies of water and evaluate, at a minimum, the treatment recommendations listed below prior to making an application.

1. Prior to treatment, if feasible, expose the water pipes coming from the well to the structure, if the pipes enter the structure within 3 feet of grade.
2. Prior to treatment applicators are advised to take precautions to limit the risk of applying the termiticide into subsurface drains that could empty into any bodies of water. These precautions include evaluating whether application of the termiticide to the top of the footer may result in contamination of the subsurface drain. Factors such as depth to the drain system and soil type and degree of compaction must be taken into account in determining the depth of treatment.
3. When appropriate (i.e., on the water side of the structure), the treated backfill technique (described above) can also be used to minimize off-site movement of termiticide.

EXTERIOR PERIMETER/INTERIOR SPOT TREATMENT*

*Not approved for use in Louisiana.

INFORMATION

Exterior Perimeter/Interior Spot Treatment is an optional method of termite treatment only for use in post-construction applications, after the final grade is established. Structural protection when using the Exterior Perimeter/Interior Spot Treatment is accomplished by: 1) establishing a continuous treated zone around the entire exterior foundation wall of the building; and 2) spot-treating infested areas on the building interior. Soil adjacent to the exterior foundation wall must be treated in the same manner as conventional (full) application. It is required that a complete and continuous treated zone be achieved around the entire exterior perimeter, including under any attached slabs such garages, porches, patios, driveways and pavement adjoining the foundation. Interior spot treatments must then be made to any indoor areas where termite activity is present. Optional interior spot treatments may also be made to high risk areas including, but not limited to plumbing and utility penetrations (including bath traps), along settlement cracks and expansion joints, and dirt-filled porches.

Exterior Perimeter/Interior Spot Treatment can be used as a preventative treatment (before structural infestation occurs) or as a curative treatment (after structural infestation occurs) in existing structures. Preventative treatment does not include pre-construction applications made to protect construction. It is required that a thorough structural inspection be completed before treatment, to locate all areas of active infestation. Spot treatment of all known sites of termite activity is required with this optional labeling. If no termite activity is observed inside the structure, interior spot treatments are not required.

EXTERIOR PERIMETER TREATMENT

It is required that all structures, regardless of the type of construction, be protected by establishing a vertical treated zone along the outer perimeter of the foundation wall. Consult the OUTER FOUNDATION WALLS section of this label (see below) for detailed directions of this treatment procedure.

1. **OUTER FOUNDATION WALLS:** Application must be made by trenching, or where appropriate (see below) by trenching, or trenching and rodding from the bottom of the trench, around the outside of the foundation walls. When trenching, excavate a trench along the outside foundation that is about 6 inches wide and 6 inches deep. Apply 4 gallons of solution (see APPLICATION VOLUME) per 10 linear feet, per foot of depth to provide a uniform vertical treated zone.
   - For shallow foundations, one foot or less of depth, dig a narrow trench that does not exceed 6 inches wide and 6 inches deep along the outside of the foundation walls, being careful not to dig below the bottom of the footings. For foundations with exposed footings, dig a trench alongside the footing taking care not to undermine the footing.
   - For basements and other foundations deeper that one foot, the application must be made by trenching and rodding from bottom of a shallow trench. When rodding, rod holes must be spaced in a manner that will allow for a continuous treated zone, not to exceed 12 inches, to be deposited along the treated area. Rod holes must not extend below the footing. Rodding depth should be to the top of the footer, or to a maximum depth of 4 feet, or according to state or local regulations.
   - For all applications, apply the solution into the trench and mix with the excavated soil as it is replaced into the trench. Use a low-pressure spray to treat soil that will be replaced into the trench after rodding. Mix spray solution with the soil as it is being replaced in the trench.

Where direct access to soil on the outer foundation wall is impossible due to attached porches, entrance platforms, garages and similar slab structures, consult the CONCRETE SLAB-ON-GROUND section of this label for directions on treatment of soil beneath these structures. However, where obstruction (e.g., concrete walkways) adjacent but not attached to foundation, or where soil type and/or conditions prevent trenching the exterior perimeter treatment may be performed at the obstructed location by rodding alone. When rodding, rod holes must be spaced in a manner that will allow for a continuous treated zone, not to exceed 12 inches, to be deposited along the treated area.

2. CONCRETE SLAB-ON-GROUND: To treat soil beneath a slab, including attached porches, carports, entrance platforms, garages and similar slab structures abutting the foundation wall, it is necessary to drill through the slab. If an infestation is associated with an expansion joint, crack, utility penetration, or similar access point in the slab, treat by drilling and injecting through the slab. Drill holes on both sides of the infested site. Apply 4 gallons of solution (see APPLICATION VOLUME) per 10 linear feet. DO NOT MAKE TREATMENT UNTIL LOCATION OF HEAT OR AIR CONDITIONING DUCT AND VENTS ARE KNOWN AND IDENTIFIED. USE EXTREME CAUTION TO NOT CONTAMINATE DUCTS AND VENTS. Plug and fill all drilled holes in commonly occupied areas with suitable sealant. Plugs must be of non-cellulose material.

3. INACCESSIBLE CRAWL SPACES: If termite activity is found along the perimeter wall or on a pier within an inaccessible crawl space, areas with termite activity must be treated. Apply 4 gallons of solution (see APPLICATION VOLUME) per 10 linear feet to create a vertical treated zone, which must extend a minimum of 3 feet on both sides of the infested site. Optional directions for horizontal rodding: Treatment may also be made by drilling through the foundation wall (or through the floor above) to treat the soil along the perimeter wall at a rate of 4 gallons of solution (see APPLICATION VOLUME) per 10 linear feet. Drill spacing must be at intervals not to exceed 16 inches. Many states have shorter intervals so check state regulations which may apply. If termite activity is neither along the perimeter wall nor on a pier within the inaccessible crawl space, to prevent subterranean termites from constructing mud tubes between soil in the crawl space and wooden elements in the structure, an overall soil treatment of this product may be applied. Remove all cellulose debris before application. Apply 1 gallon of solution (see APPLICATION VOLUME) per 10 square feet to provide a uniform treated zone.

4. ACCESSIBLE CRAWL SPACES: If termite activity is found within a accessible crawl space, the area(s) where termite activity exist must be treated by trenching, or trenching and rodding from the bottom of the trench, along the interior foundation walls, around piers, interior supports in contact with the soil, plumbing, or utility services. Apply 4 gallons of solution (see APPLICATION VOLUME) per 10 linear feet, per foot of depth, to create a vertical treated zone, which must extend a minimum of 3 feet on both sides of the infested site. Rodding may be done from the bottom of a shallow trench to the top of the footing or to a minimum depth of 4 feet. When rodding, rod holes must be spaced in a manner that will allow for a continuous treated zone, not to exceed 12 inches, to be deposited along the treated area. Rod holes must not extend below the footing. When trenching, dig a narrow trench about 6 inches wide and 6 inches deep. Use a low-pressure spray to treat soil which will be placed in the trench, mixing the spray solution with soil as it is being placed in the trench.

RESTRICTION: Do not allow people or pets to contact or to reoccupy any contaminated areas of the structure until the clean-up is completed.

INTERIOR SPOT TREATMENT

Targeted applications must be made to all known infested sites inside the structure. One or more of the following application methods must be used to make interior spot treatments:

- Sub-slab injections made through the slab at or near areas where termites are known to be penetrating the slab to reach wood in the structure and/or at or near sites of active infestations. Apply 4 gallons per 10 linear feet per foot of depth. Sub-slab injections must extend to a minimum of 3 feet on either side of every known infested site at expansion joints or cracks in slabs.
- Void treatments using injection of sprays, mist or foams into above ground structural voids, termite carton nests, and other infested locations.
- Wood treatments using injection techniques and/or surface applications, to treat active infestations in structural timbers.

To maximize dispersion of treatment solution in soil and in above ground locations, the use of foam and directional dispersion tips is encouraged for all interior spot treatments. Consult section(s) of this label appropriate to the element of construction, FOAM APPLICATIONS or CONTROL OF WOOD INFESTING PESTS for detailed directions on any of these treatment procedures.

1. INTERIOR SLABS: When termite activity is located within an interior wall or structural member, the soil beneath the slab and the wall void at this site of activity must be treated. The source of infestation at an expansion joint, crack, through a utility penetration, or similar access point in the slab, must be treated by drilling and injecting through the slab. Drill holes in the slab must be spaced in a manner that will allow for application of a continuous treated zone, which must extend a minimum of 3 feet on either side of the infested site. Apply 4 gallons of solution (see APPLICATION VOLUME) per 10 linear feet. To maximize dispersion of treatment solution in soil, the use of foam and directional dispersion tips is encouraged. To treat the wall void, consult section(s) of this label appropriate to the element of construction, FOAM APPLICATIONS or CONTROL OF WOOD INFESTING PESTS for detailed directions on any of these treatment procedures. DO NOT MAKE TREATMENT UNTIL LOCATION OF HEAT OR AIR CONDITIONING DUCTS AND VENTS ARE KNOWN AND IDENTIFIED. USE EXTREME CAUTION TO NOT CONTAMINATE DUCTS AND VENTS. Plug and fill all drilled holes in commonly occupied areas with suitable sealant. Plugs must be of non-cellulose material or covered by an impervious, non-cellulose material.

2. HOLLOW BLOCK FOUNDATION OR MASONRY VOIDS: Termite activity located within hollow-block foundations or masonry voids must be treated. Spot treatment at the site(s) of termite activity must extend a minimum of 3 feet on both sides. Treat masonry voids by applying 2 gallons of solution per 10 linear feet to the lower part of the void so that it reaches the top of the footing or soil. Drill spacing in masonry voids must be at intervals not to exceed 16 inches; states may have shorter intervals so check state regulations which may apply. To maximize dispersion of treatment solution in voids, the use of foam and directional dispersion tips is encouraged. To treat structural voids above sites of termite activity in masonry, consult section(s) of this label appropriate to the element of construction, FOAM APPLICATIONS or CONTROL OF WOOD INFESTING PESTS for detailed directions on any of these treatment procedures. Treatment of voids in block or rubble foundation walls must be closely examined. Applicators must inspect areas of possible runoff as a precaution against application leakage in the treated areas. Some areas may not be treatable or may require mechanical alteration prior to treatment. All leaks resulting in the deposition of termiticide in locations other than those prescribed on this label must be cleaned up prior to leaving the application site (refer to Precautionary Statements).

Restriction: Do not allow people or pets to contact or to reoccupy the contaminated area of the structure until the clean-up is completed.

3. BATH TRAPS: If termite activity is observed within 2 feet of the bath trap, then exposed soil or soil covered with tar or similar type of sealant around plumbing and/or drain pipe entry areas must be treated. Tar or sealant may have to be removed to allow for adequate soil treatment. An access door or inspection portal should be installed if one is not present. After inspection and removal of any wood or cellulose debris, the soil can be treated by rodding or drenching the soil at the volume of no less than 3 gallons of solution per square foot.

4. SHOWER OR FLOOR DRAINS: If termite activity is observed within 2 feet of a shower of floor drain in the slab, the soil beneath the drain must be treated. Drill through the slab adjacent to the drain and use sub-slab injection to apply solution to the soil. Multiple access points may be drilled adjacent to the drain. Treat soil at a volume of 1 gallon of solution per square foot.

FOAM APPLICATIONS

Construction practices, soil subsidence and other factors may create situations in which a continuous treated zone cannot be achieved using conventional treatment alone. In situations where necessary, conventional application methods can be supplemented through use of foam generating equipment, or similar devices, to provide a continuous treated zone.

Foam application may be made alone or in combination with conventional application methods, provided that the labeled amount of active ingredient per unit area is used.

Foam Application Use Directions: Mix appropriate concentration of FUSE™ in water and add the manufacturer's recommended quantity of foam agent to the FUSE™ solution (see table for foaming recommendations). Apply a sufficient volume of FUSE™ foam alone or in combination with liquid solution to provide a continuous treated zone at the labeled rate for specific application sites.

NOTE: Add the manufacturer's recommended quantity of foam agent to the FUSE™ solution.

MIXING TABLE - FUSE™ FOAM

FUSE™ (mL)	GALLONS OF WATER	FOAM EXPANSION RATIO	FINISHED FOAM (0.067% ai)
160	1	20:1	20 gal
80	1	10:1	10 gal
40	1	5:1	5 gal

MIXING TABLE - FUSE™ FOAM

FUSE™ (fl oz)	GALLONS OF WATER	FOAM EXPANSION RATIO	FINISHED FOAM (0.067% ai)
6.9	1	25:1	25 gal
	2.5	10:1	
	5	5:1	
13.8	1	50:1	50 gal
	2.5	20:1	
	5	10:1	

Depending on the circumstances, foam applications may be used alone or in combination with liquid solution applications. Applications may be made behind veneers, piers, chimney bases, into rubble foundations, into block voids or structural voids, wall voids, under slabs, stoops, porches, or to the soil in crawlspaces, and other similar voids.

Foam and liquid applications must be consistent with volume and active ingredient instructions in order to ensure proper application has been made. The volume and amount of active ingredient are essential to an effective treatment. At least 75% of the gallons of FUSE™ must be applied as a typical liquid treatment. The remaining 25% or fewer gallons is delivered to appropriate locations using a foam application.

NOTE: When foam is used solely to kill subterranean termites in above ground locations (such as feeding galleries in wooden framing, or in voids with framed walls), and whenever the target pest is other than subterranean termites (drywood termites, beetles, ants, etc.) dilute solutions of FUSE™ may be expanded by foaming without concentrating the FUSE™ solution as previously described for soil applications. Add the manufacturers' recommended volume of foaming agent to produce foam of the desired expansion ratio. Use application tips and methods suitable to the site and pest.

CONTROL OF WOOD INFESTING PESTS

For control of above ground termites and carpenter ants in localized areas, apply a 0.067% to 0.13% solution of sufficient volume of FUSE™ foam to voids and galleries in damaged wood, and in spaces between wooden structural members and between the sill plate and foundation where wood is vulnerable. Applications may be made to inaccessible areas by drilling, and then injecting the suspension or foam with a suitable directional injector into the damaged wood or wall voids. Termite carton nests in building voids may be injected with a 0.067% to 0.13% suspension or foam. Multiple injection points to varying depths may be necessary. It is desirable to physically remove carton nest material from building voids when such nests are found. Application to attics, crawl spaces, unfinished basements or man-made voids may be made with a coarse fan spray of 0.067% to 0.13% solution or foam to control exposed worker and winged reproductive forms of termites or carpenter ants. This type of application is intended to be a supplemental treatment for control of above ground subterranean termites and carpenter ants.

It is recommended to remove or prune away any shrubbery, bushes, and tree branches touching the structure. Vegetation touching the structure may offer a route of entry for ants into the structure. This may allow ants to inhabit the structure without coming in contact with the treatment. If nests are found, direct treatment of FUSE™ can be made to theses nests.

Use a 0.067% to 0.13% solution to control existing infestations of or to prevent infestation by termites or carpenter ants in trees, utility poles, fencing and decking materials, landscape timbers and similar non-structural wood-to-soil contacts. If possible, locate the interior infested cavity and inject a 0.067% to 0.13% solution or sufficient volume of FUSE™ foam using an appropriate treatment tool with a splash back guard. These non-structural wood-to-soil contacts may also be treated by applying a solution to the soil as a spot application or continuous treated zone applied as a drench or by rodding around the base of the point(s) of soil contact(s). Rod holes must be placed approximately 3 inches away from the soil contact point(s) and spaced no more than 12 inches along the perimeter of the soil contact(s). For small poles or posts (< 6 inches in diameter), apply 1 gallon per foot of depth. For larger constructions, apply 4 gallons per 10 linear feet per foot of depth. Retreat as needed to maintain protection.

Termite carton nests in trees may be injected with a 0.067% to 0.13% solution or sufficient volume of foam using a pointed injection fool. Multiple injection points to varying depths may be necessary. Removal of carton material from trees is desirable but may not be necessary when foam application is used. In some instances, a perimeter application of a 0.067% to 0.13% solution applied to soil around the root flare of the tree may be necessary to prevent reinfestation by termites in the soil. For small trees (6 inches in diameter), apply 1 gallon of solution. For larger trees, apply 4 gallons per 10 linear feet (measured as the circumference at the root flare).

For protection of firewood or other wood products stored in contact with soil from carpenter ants and termites, treat soil prior to stacking with a 0.067% to 0.13% solution at 1 gallon per 10 square feet to prevent infestation. Curative application to the soil around firewood or other wood products stored in contact with soil may be made as described for non-structural wood-to-soil contacts (above).

Drywood termites and wood-infesting beetles or borers (such as, but not limited to, powder post beetles, anobiid or deathwatch beetles, false powder post beetles, old house borers, wharf borers, or ambrosia or bark beetles). **Galleries and structure voids** can be treated with sprays, mists, or foams of a 0.067% to 0.13% FUSE™ solution. Locate galleries by using visual signs (frass or pellets, blistered wood, emergence or clean out holes), the presence of live insects, mechanical sounding techniques, or listening devices (e.g., stethoscopes, acoustic emission detectors). Penetrate the gallery system by drilling holes to receive the injector tip or treatment tool. Distribute drill holes to adequately cover the gallery system. [NOTE: Avoid drilling where electrical wiring, plumbing lines, etc. are located.] Apply FUSE™ solutions as a low pressure (about 20 psi) spray or by misting or where appropriate, by foaming. It is not necessary to treat to the point where runoff is detected from adjacent holes.] NOTE: Do not apply where electrical shock hazards exist.] Drill holes must be sealed after treatment. Also, **wood surfaces** can be sprayed or misted with a 0.067% to 0.13% solution or, where appropriate, use a sufficient volume of foam. For inaccessible surfaces, drill and treat the interior of structural voids. Surfaces treated may include exposed wooden surfaces in crawlspaces, basements, or attics, wooden exterior surfaces such as decks, fencing, or siding, structural voids, channels in damaged wood, in spaces between wooden members of a structure, and junctions between wood and foundations. Apply by brushing or as a coarse, low pressure (about 20 psi) spray to the wood surface; apply sufficient volume to cover the surface to the point of wetness, but avoid applying to the point of runoff. When spraying overhead in non-living areas, cover surfaces below the treated area with plastic sheeting or similar material, Avoid contact with treated surfaces until spray deposits have dried. Retreat as needed to maintain protection.

Localized treatment for carpenter bees: Apply a 0.067% to 0.13% solution as a spray or mist, or sufficient volume of foam, directly into gallery entrance holes. Following treatment, entrance holes may be plugged with small pieces of steel wool or similar material.

RETREATMENT

Retreatment for subterranean termites can only be performed if there is clear evidence of reinfestation or disruption of the treated zone due to construction, excavation, or landscaping and/or evidence of the breakdown of the treated zone in the soil. The vulnerable or reinfested areas may be retreated in accordance with application techniques described in this product's labeling. The timing and type of these retreatments will vary, depending on factors such as termite pressure, soil types, soil conditions and other factors which may reduce the effectiveness of the treated zone. Retreatment may be made as either a spot or complete treatment.

When a structure is not known to be reinfested and the treated zone is not disturbed, but where the structure was last treated five or more years ago, retreatment may be performed if, in the judgment of the applicator, it is necessary to ensure adequate protection of the structure. In determining the timing of any retreatment, the applicator must consider efficacy and/or degradation data and/or site-specific conditions and previous experience that indicate a vulnerability of the structure to termite attack.

Annual retreatment of the structure is prohibited unless there is clear evidence that reinfestation or treated zone disruption has occurred.

When another registered termite control product/system is used as the primary treatment for prevention or control of subterranean termites and is applied to all label-specified areas, FUSE™ may be applied as a spot application in a secondary treatment to critical areas of the structure including plumbing and utility entry sites, bath traps, expansion joints, foundation cracks. The outside foundation wall, and areas of known or suspected activity at either a pre-construction or post-construction timing. These secondary treatments must be made applied in amounts and concentration in accordance with label directions relevant to the treatment area(s) to receive the secondary treatment.

DIRECTIONS FOR USE TO CONTROL LISTED PESTS ON OUTSIDE SURFACES AND ALONG FOUNDATION PERIMETER OF LISTED STRUCTURES

Listed structures are residential, institutional, commercial and industrial buildings and utility enclosures.

USE RESTRICTIONS:

- Do not allow this product to contact plants in bloom if bees are foraging the treatment area.
- Only applicators wearing the personal protective equipment required by this product label may be in the area during application.
- Do not treat within a distance of 1 foot out from the dripline of edible plants.
- Do not contaminate public or private water supplies.
- Do not apply to wasp or hornet nests if they are not attached to or within the structure.
- Do not make treatments during times of precipitation.
- Do not allow residents, children, other people or pets into the treatment area until sprays have dried. After treatment, the applicator is required to check for leaks resulting in the deposition of treatment dilution in locations other than those prescribed in this label. When found, this material must be cleaned prior to leaving the application site. Do not allow people or pets to contact contaminated areas or to reoccupy contaminated areas of the structure until clean-up is completed.
- Do not spray air conditioning units or intake vents.
- Do not use indoors except for application into wall voids or as directed otherwise in this label.
- Do not exceed the maximum total applications per year noted in the use directions.
- Do not apply to playground equipment and pet quarters.
- Do not apply to applications to runoff or drip from treated surfaces.
- Do not apply to boat houses, including their piers or pilings.
- Do not apply within 5 feet of wells or cisterns.
- Do not apply to French drains or other permeable drainage.
- Doors and windows adjacent to application site must be closed during surface application.
- Do not apply within 15 feet of bodies of fresh water; lakes, reservoirs, rivers, permanent streams, marshes, natural ponds and commercial fish ponds. A 15- foot buffer of uniform groundcover must exist between application zone and bodies of fresh water (uniform ground cover is defined as land which supports vegetation of greater than 2 inches in height throughout).
- Do not apply within 60 feet of estuarine bodies of water. Estuarine water bodies are brackish, tidal water bodies such as bays, mouths of rivers, salt marshes and lagoons.

Use FUSE™ to kill and to provide residual control of the following pests:
Ants (acrobat, Argentine, big-headed, Caribbean crazy, carpenter, crazy, odorous, pavement, and thief)

Use FUSE™ to kill the following pests:
Asian lady beetles, darkling beetles
Cellar spiders
Box-elder bugs, pill bugs
Cluster flies
European earwigs
House crickets
Millipedes
Silverfish

MIXING INSTRUCTIONS

For perimeter pest treatments mix a 0.067% to 0.13% spray dilution of FUSE™ by filling the treatment tank 1/4 to 1/3 full with water, then add the 0.3 to 0.6 fluid ounces FUSE™ per finished gallon. The filling hose must be equipped with an anti-backflow device or the water flow must include an air gap to protect against back siphoning. Add the remaining water to the tank while agitating.

APPLICATIONS TO OUTSIDE SURFACES OF LISTED STRUCTURES AND INTO WALL VOIDS

Apply 0.067% to 0.13% of finished FUSE™ dilution as a low-pressure spray to the exterior of the structure where listed pests enter, trail around the structure or where they crawl and hide. Treat using a low-pressure coarse banded surface spray up to 18 inches in width around doors, windows, vents, pipes, foundation cracks, drilled holes or around any exterior opening where listed pests could enter the structure. Make sure to treat the joint where exterior siding (wood, vinyl, aluminum or other similar materials) meets the cement, brick or block foundation. Treat anywhere electrical, cable or telephone wires enter the house. This treatment must be made as a general surface spray, crack and crevice spray, or a wall void application. FUSE™ may be applied as a foam treatment into wall voids to kill and / or control the above listed pests. Refer to the **Foam Application** section of this label for specific foam mixing and application instructions.

Application to Perimeter of Listed Structures

Apply 0.067% to 0.13% of finished FUSE™ dilution as a low pressure, coarse, general surface spray along the foundation exterior perimeter. The applications may be made in a narrow band of 1 foot wide out by 1 foot wide up from where the ground meets the foundation or in a wide band of 2 feet wide out by 2 feet wide up from where the ground meets the foundation. Refer to the **Application Table for Perimeter Treatments** for the maximum number of applications permitted each year based on concentration and band width.

Application Table for Perimeter Treatments

Dilution Concentrate	Narrow Band 1 ft up by 1 ft out	Wide Band 2 ft up by 2 ft out
0.067%	8 perimeter applications/year	4 perimeter applications/year
0.13%	4 perimeter applications/year	2 perimeter applications/year

Do not exceed the specified number of applications per year.

Apply 2 quarts of 0.067% to 0.13% finished spray per 160 linear feet (approximately 1.5 gallons finished spray per 1000 square feet). Nests that are found on the ground within 2 feet of the foundation may be treated.

If treating with a finished dilution volume greater than 1 gallon of finished dilution, mix the appropriate amount of FUSE™ SC in the desired number of gallons of water to be applied to cover 1000 square feet. For Example: If the desired finished volume of dilution is five gallons per 1000 square feet at the high rate (0.13%), mix 0.6 fl. oz. FUSE™ for every five gallons of water in the tank.

Vegetation touching the structure may offer a route to the entry for ants into the structure without coming into contact with the treatment; therefore, it is recommended to remove or prune away any shrubbery, bushes, and tree branches touching the structure.

STORAGE AND DISPOSAL

Do not contaminate water, food or feed by storage or disposal.

Storage

Store unused product in original container only, out of reach of children and animals.

Pesticide Disposal

Pesticide wastes are acutely hazardous. Improper disposal of excess pesticide is a violation of Federal law. If these wastes cannot be disposed of by use according to label instructions, contact your State Pesticide or Environmental Control Agency, or the Hazardous Waste representative at the nearest EPA Regional Office for guidance.

Container Disposal

Nonrefillable Container: Do not reuse or refill this container. Triple rinse or pressure rinse container (or equivalent) promptly after emptying; then offer for recycling, if available, or reconditioning, if appropriate, or puncture and dispose of in a sanitary landfill, or by incineration, or by other procedures approved by state and local authorities.

Triple rinse containers small enough to shake (capacity ≤ 5 gallons) as follows: Empty the remaining contents into application equipment or a mix tank and drain for 10 seconds after the flow begins to drip. Fill the container 1/4 full with water and recap. Shake for 10 seconds. Pour rinsate into application equipment or a mix tank, or store rinsate for later use or disposal. Drain for 10 seconds after the flow begins to drip. Repeat this procedure two more times.

Pressure rinse as follows: Empty the remaining contents into application equipment or mix tank. Hold container upside down over application equipment or mix tank, or collect rinsate for later use or disposal. Insert pressure rinsing nozzle in the side of the container and rinse at about 40 PSI for at least 30 seconds. Drain for 10 seconds after the flow begins to drip.

In case of minor spills or leaks, soak up with sand, earth or other suitable material and dispose of as pesticide waste.

Control Solutions, Inc. warrants that this product conforms to the chemical description on the label thereof and is reasonably fit for purposes stated on such label only when used in accordance with directions under normal use conditions. It is impossible to eliminate all risks inherently associated with use of this product. Crop injury, ineffectiveness, or other unintended consequences may result because of such factors as weather conditions, presence of other materials, or the manner of use or application, all of which are beyond the control of Control Solutions, Inc. To the extent consistent with applicable law, Control Solutions, Inc. shall in no event be liable for consequential, special, or indirect damages resulting from the use or handling of this product. All such risks shall be assumed by the Buyer. In addition to the foregoing, no purchaser of this product (other than an end user) shall be entitled to any reimbursement for any loss suffered as a result of any suspension or cancellation of the registration for this product by the U.S. Environmental Protection Agency. Except, as expressly provided herein and to the extent consistent with applicable law, Control Solutions, Inc. makes no warranties, guarantees, or representations of any kind, either expressed or implied, or by usage of trade, statutory or otherwise, with regard to the product sold, including, but not limited to merchantability, fitness for a particular purpose, use or eligibility of the product for any particular trade usage. The exclusive remedy of any buyer or user of this product for any and all losses, injuries, or damage resulting from or in any way arising from the use, handling, or application of this product, whether in contract, warranty, tort, negligence, strict liability, or otherwise, shall be damages not exceeding the purchase price paid for this product or, at Control Solutions, Inc. election, the replacement of this product.

Control Solutions, Inc.
5903 Genoa-Red Bluff
Pasadena, TX 77507

Notes:

FUSE™

TERMITICIDE/INSECTICIDE

It is a violation of federal law to use this product in a manner inconsistent with its labeling.

- **DO NOT** use this product for termite or other pest control indoors, except for label-specified applications for termite control and foam applications to wall voids for control of other listed pests.
- **DO NOT** use on animal trophies or animal skins.
- **DO NOT** use on/in commercial beehives.

See inside booklet for additional **Restrictions, First Aid, Precautionary Statements, Directions For Use, Conditions of Sale and Warranty,** and state-specific use sites and/or restrictions.

For sale to, use and storage only by individuals/firms licensed or registered by the state to apply termiticide and/or general pest control products.

ACTIVE INGREDIENTS:	
Imidacloprid: 1-1(6-Chloro-3-pyridinyl)methyl]-N-nitro-2-imidazolidinimine	21.4%
***Fipronil**	6.6%
OTHER INGREDIENTS:	72.0%
TOTAL	100.0%

(5-amino-1-(2,6-dichloro-4-(trifluoromethyl)phenyl)-4-((1,R,S)-(trifluoromethyl)sulfinyl)-1-H-pyrazole-3-carbonitrile)

Contains 2.0 pounds of imidacloprid per gallon and 0.6 pounds of fipronil per gallon.

Shake well before using.

EPA Reg. No. 53883-328

EPA Est. No. 53883-TX-002
37429-GA-001[ST]
37429-GA-002[SO]

KEEP OUT OF REACH OF CHILDREN

CAUTION/PRECAUCIÓN

PRECAUCIÓN AL USUARIO: Si usted no puede leer o entender inglés, no use este producto hasta que la etiqueta le haya sido explicada ampliamente. (**TO THE USER:** If you cannot read or understand English, do not use this product until the label has been fully explained to you.)

(See attached label for additional precautionary information and complete Directions for Use.)

Control Solutions, Inc.
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Pasadena, TX 77507-1041

NET CONTENTS: **137.5 FL. OZ.**

Pages 105-109 Confidential Statement of Formula may be entitled to confidential treatment